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# QUALITY IN HIGHER EDUCATION

## HEARING

BEFORE THE

SUBCOMMITTEE ON
EDUCATION, ARTS AND HUMANITIES

OF THE

## COMMITTEE ON
## LABOR AND HUMAN RESOURCES
## UNITED STATES SENATE

NINETY-NINTH CONGRESS

SECOND SESSION

ON

EXAMINING THE ROLE OF THE FEDERAL GOVERNMENT IN ASSESSING AND IMPROVING POSTSECONDARY EDUCATIONAL PROGRAMS

JANUARY 28, 1986

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# QUALITY IN HIGHER EDUCATION PROGRAMS

TUESDAY, JANUARY 28, 1986

U.S. SENATE,
SUBCOMMITTEE ON EDUCATION, ARTS AND HUMANITIES,
COMMITTEE ON LABOR AND HUMAN RESOURCES,
*Washington, DC.*

The subcommittee convened, pursuant to notice, at 10:02 a.m., in room SD–430, Dirksen Senate Office Building, Senator Robert T. Stafford (chairman of the subcommittee) presiding.

Present: Senators Stafford, Pell, Simon, and Dodd.

## OPENING STATEMENT OF SENATOR STAFFORD

Senator STAFFORD. The Subcommittee on Education, Arts and Humanities will please come to order.

Today the subcommittee holds the first in a series of hearings on the quality of higher education in America. In particular, the subcommittee will look closely at the proper role of the Federal Government in assessing and improving postsecondary educational programs.

Higher education has always been the principal avenue by which Americans improve their lives, and therefore deserves our careful attention. The hopes and dreams of millions have rested on the notion that with hard work and a good education, it is possible to become a success in this country. Our student aid programs were rightly established to improve access to a higher education for many millions of students from low- and middle-income families. As access has increased for these students because of Pell grants—named after my colleague, Senator Pell, who is here with me—campus-based aid and guaranteed student loans, we must also ensure that the postsecondary education they receive is of the highest caliber.

Often as members of the educational community and the Congress debate the importance of Federal higher education programs, we focus on the structure and details of existing programs and forget that the purpose of their existence is the student. We must constantly be on guard against Federal programs and policies which are not improving educational access or quality. We must not lose sight of the link between the level of educational achievement of the American citizen and the strength of our Nation as a whole.

At today's hearings, we are pleased to welcome as our first witness, the Secretary of Education, William Bennett. Last month, Senator Pell, Secretary Bennett, and I had the opportunity to briefly discuss the role of the Federal Government in improving postsec-

ondary education. In particular, I have been interested in the role of the Department of Education in the accreditation process, the process by which a particular postsecondary institution is approved for use of Federal student aid dollars.

Over the past decade, the Federal investment in student aid has risen dramatically, and now totals about $8.9 billion annually. Many students who receive Federal funds assume that the Federal Government has somehow put its stamp of approval on the institution they attend. As the ancedotal evidence continues to mount that many students are taken advantage of by shoddy institutions with no real intention of providing quality education programs, I feel it is incumbent upon those who support Federal student aid to make sure that the money is spent wisely.

What better time to ask this question than at the very time the Congress is considering the reauthorization of the Higher Education Act for the next 5 years? I look forward to working with Secretary Bennett and other members of this committee to make sure the system works best for the students it was set up to assist.

Senator Pell, it is great to have you here, and you may have an opening statement at this time, also.

Senator PELL. Thank you very much, Mr. Chairman.

I congratulate you on holding this hearing on the question of the quality in higher education.

When we reauthorized the Higher Education Act in 1980, I had hoped we had reached the point where no American would be denied access to a college education because of lack of money and then we could concentrate on quality.

However, these last 5 years have taken a great deal of the time and attention of the subcommittee in focusing on access as much as on quality. We have seen battle after battle to prevent drastic cuts in Federal student aid programs, and our efforts to protect these programs has consumed perhaps more of our time than it should.

However, first, you have the question of access, and then I think you get to the question of quality. There is no point in emphasizing the quality unless you first have the access.

Nevertheless, members of our subcommittee have heard often where schools have promised a certain kind of curriculum or employment after graduation and then cannot fulfill their promises. We have also heard of schools that recruit students whom the school knows cannot successfully complete a course of study, but are recruited simply to get their money. Situations of this nature exist, and they should be halted. We must have a postsecondary system of education in America that is above reproach, where quality is not in doubt.

In this regard, too, I have often said that the real strength of our Nation is based on the sum total of the education and the character of our teachers, and we have to focus on the education, but also, I would be very interested in hearing the Secretary's views about how public education and the public tax dollar can be used to bring out the character of our people as well as just the education.

Thank you, Mr. Chairman.

[The prepared statement of Senator Pell follows:]

STATEMENT OF SENATOR CLAIBORNE PELL (D,RI) ON THE QUALITY IN HIGHER EDUCATION HEARING, JANUARY 28, 1986

Mr. Chairman, I want to commend you for holding this very important hearing on the question of quality in higher education.

When we reauthorized the Higher Education Act in 1980, I had hoped that through our student assistance programs we had almost reached the point where no American would be denied access to a college education because of a lack of money. I had also hoped that realization of that goal would permit us to turn our attention to the kind of education students were receiving for the money they were spending.

Unfortunately, our attention over the past five years has been diverted from the matter of quality to the matter of survival as we have fought battle after battle to prevent drastic cuts in our Federal student aid programs. Our efforts to protect these programs have literally consumed almost all of our time. I am encouraged, therefore, that we are taking a brief respite from our battles to look, at least for the moment, at the critical question of quality.

Make no mistake about it, however, we take this break under the cloud of Gramm-Rudman and the prospects of cuts in education that could approach a total of 30% for fiscal years 1986 and 1987. Cuts of that magnitude would have a devastating effect on American education at every level, and would undue much of what we have accomplished over the past decade.

Today, the Federal Government annually contributes more than $8 billion to the college education of millions of Americans. The quality of the education these students are receiving for the money they and we expend is something that

we, all too often, simply take for granted. Through a complex accreditation process the Federal Government approves accreditation agencies that, in turn, accredit postsecondary institutions throughout the United States. Accreditation by one of these agencies enables a school to receive Federal student aid monies.

Increasingly, this process has raised concern about the quality of education being offered at an individual institution. Members of our Subcommittee have heard time and time again of schools that promise a certain kind of curriculum or employment after graduation and then cannot fulfill their promises. We have also heard of schools that recruit students whom the school knows cannot successfully complete a course of study, but are recruited simply to get their money. If situations of this nature exist, they must be halted. We simply must have a postsecondary system of education in America that is above reproach. . . . .where quality is not in doubt.

I look forward, therefore, to hearing what Secretary Bennett has to say this morning. In his tenure as Secretary of Education, we have come to know Bill Bennett as a person who always speaks his mind. While I may not always agree with what he has to say, I do appreciate his candor, and I look forward to what I hope will be candid and forthright remarks on this very important matter.

Senator STAFFORD. Thank you very much, Senator Pell.

During the years that you and I have served on this subcommittee and been particularly interested in postsecondary education, the man we have dealt with on the House side on important issues has been the gentleman who is now Senator Paul Simon from Illinois. We were delighted when he moved over to the Senate side, and we are deeply delighted he opted to become a part of this subcommittee.

So, Paul, if you have a statement, we would be delighted to have that.

Senator SIMON. Thank you, Mr. Chairman. I have no formal statement. I am pleased to have the Secretary here. I am pleased to join both of you who have contributed so much in this field of education.

I think the two of you have touched on the fundamental question. Access continues to be a problem that we have to deal with. But also, we are going to have to pay more attention to the quality problem. I guess the phrase I used, "quality problem," suggests that there is something of a problem in the country today. I do not know that it is more severe than it was 1 year ago or 2 years ago or 5 years ago, but we are in a competitive world where we are going to have to pay attention to quality. We want to maintain access, but we also are going to have to see that we provide quality opportunity not only for our young people, but increasingly for people of all age groups who want to take advantage of advanced education.

It is a pleasure to be here. Thank you.

Senator STAFFORD. Thank you very much, Senator Simon.

At this point, without objection, I am going to place the statements of the chairman of the full committee, Senator Hatch, and the ranking minority member of the committee, Senator Kennedy, in the record, and having done that, will reserve the right to other members who may not be able to get here this morning to place their statements in the record if they wish.

[The prepared statements of Senators Hatch and Kennedy follow:]

STATEMENT OF SENATOR HATCH

EDUCATION SUBCOMMITTEE HEARING

ON

THE FEDERAL ROLE IN MEASURING THE

QUALITY OF HIGHER EDUCATION PROGRAMS

MR. CHAIRMAN, I REGRET THAT A PREVIOUS COMMITMENT PRECLUDES MY ATTENDANCE AT THIS TIMELY HEARING. AS THE FULL COMMITTEE ON LABOR AND HUMAN RESOURCES PROCEEDS WITH ITS WORK ON REAUTHORIZATION OF THE HIGHER EDUCATION ACT OF 1965, THE QUALITY OF INSTRUCTION AND THE VALUE OF THE DEGREE CONFERRED ON OUR STUDENTS ARE CERTAINLY ISSUES OF PARAMOUNT IMPORTANCE.

I AM CERTAIN THAT, AS IN THE PAST, THE TESTIMONY OF MY GOOD FRIEND BILL BENNETT, THE SECRETARY OF EDUCATION, WILL BE INSIGHTFUL AND HELPFUL. I HOPE THE SECRETARY WILL CONTINUE HIS FIGHT TO RAISE THE LEVEL OF DEBATE ON THESE ISSUES AND, IN SO DOING, IMPROVE THE QUALITY OF EDUCATION IN AMERICA. I ALSO HOPE HE WILL KEEP HIMSELF AVAILABLE TO ADVISE ANY OF US ON THE EDUCATION SUBCOMMITTEE AND THE FULL LABOR AND HUMAN RESOURCES COMMITTEE ON THIS AND OTHER ISSUES PERTAINING TO REAUTHORIZATION OF THE HIGHER EDUCATION ACT.

Statement of Senator Edward M. Kennedy

Subcommittee on Education, Arts and Humanities

January 28, 1986

I am pleased that the Education Subcommittee has begun to carefully examine the role of the Federal Government in measuring the quality of higher education programs. It is our responsibility to encourage the higher education community to continue to improve postsecondary education in the United States and it is important that we re-examine the Federal Government's involvement in ensuring quality in higher education.

I would like to thank Senator Stafford, our Chairman, and Senator Pell for their efforts to address this critical issue and I look forward to working with them in the near future to develop sound proposals that encourage the continued development of quality in America's postsecondary education.

In these times of overwhelming federal deficits, it is important that the Federal Government ensure that the valuable and necessary federal resources now being used to help our young people attain higher knowledge through postsecondary institutions are in fact buying a quality education and experience for each student. We all know that the cost of higher education in America has increased dramatically over the past several years. Many of the Federal student aid programs no longer provide the amount of help originally intended and as a result, many students are becoming debt burdened in order to obtain a postsecondary education. Many are deciding not to pursue higher education at all. It is time for the higher education community to look carefully at ways to improve institutional quality while controlling rising costs.

I believe that all entities concerned with higher education, the Federal Government, the States, the higher education institutions, and the students, have a responsibility to work together to provide the highest quality of teaching, training and learning possible. At the same time we must be careful to preserve the integrity and independence of our higher education institutions.

Postsecondary education represents a long-term investment in our young people and in our future. That investment should be protected and should be subjected to the highest standards. The returns on this long-term investment will decide our future as a nation and as a people.

Senator STAFFORD. We are now at the point where I can turn to Secretary Bennett. Let me say, Mr. Secretary, we are delighted to have this chance to welcome you to this committee. I think this may be the first time you have been with us officially, and we look forward to your statement.

**STATEMENT OF HON. WILLIAM J. BENNETT, SECRETARY OF EDUCATION, WASHINGTON, DC, ACCOMPANIED BY DR. BRUCE CARNES, DEPUTY UNDERSECRETARY FOR PLANNING, BUDGET AND EVALUATION, AND DR. CHESTER FINN, ASSISTANT SECRETARY FOR RESEARCH**

Secretary BENNETT. Thank you very much, Mr. Chairman.

May I start by offering my regrets to the Senators from New England and my congratulations to the Senator from Illinois for an event that I have heard just about as much as I want to hear about today.

I do not suppose I should put in the record that I had the Patriots and 11 points.

Senator STAFFORD. So did I, Mr. Secretary. [Laughter.]

Secretary BENNETT. I appreciate the company very much, Senator Stafford. Thank you. And we saw Senator Pell in his sweatshirt; I guess everybody saw that.

May I introduce my colleagues, Deputy Under Secretary for Planning, Budget and Evaluation, Dr. Bruce Carnes, and Assistant Secretary for Research, Dr. Chester Finn.

Mr. Chairman and members of the committee, I am pleased to have this opportunity to testify before your subcommittee on the accreditation of postsecondary institutions.

I have a longer statement, Mr. Chairman, which I would like to have submitted for the record, but if I may just summarize in about 10 minutes.

In order to properly consider this topic, it should be placed within the context of broader issues concerning the quality of postsecondary education. I want to compliment you, Mr. Chairman, both for taking the initiative in this area and for your longstanding concern for the quality of postsecondary education in America.

There is no question that our Nation has created the world's finest system of postsecondary education. At its best, it combines the finest research and teaching with the greatest variety of educational programs available anywhere. Today, 62 percent of American high school graduates go on to enroll in postsecondary institutions, for a total enrollment of almost 18 million people.

Expenditures by postsecondary institutions have nearly doubled since 1966, and totaled $90 billion in 1984. Funding from Federal, State, and local governments accounted for almost half this total—$44 billion in 1984, up from $26 billion in 1966 when adjusted for inflation. It is clear that the American people have been generous to our institutions of postsecondary education. This generosity derives from the knowledge that these institutions are an indispensable foundation of our economic progress and national well-being and from the firm belief that they offer a gateway to the American dream.

Although many students receive an excellent education from these postsecondary institutions, concern has recently been expressed that many of our institutions of postsecondary education are not establishing or applying suitable standards of quality.

For example, a 1984 General Accounting Office study of proprietary schools found that many do not establish or enforce meaningful ability to benefit standards for the Federal aid recipients they enroll who have never graduated from high school, and 61 percent of Pell grant recipients admitted under the ability to benefit clause do not complete their educational programs.

Audit reports and program reviews, as well as other indicators, suggest that some institutions have been admitting students without adequately assessing their ability. Even in instances where admission tests are given, they are sometimes geared to third and fourth grade-level questions. Often there is no relationship between the test and the educational subject matter the institution is offering. Often, passing scores have never been defined. Indeed this problem, whether due to lax admission standards or inadequate instruction, is not limited to vocational or proprietary institutions. Some colleges and universities also graduate large numbers of students from such professional programs as accounting and pharmacy, and these students are unable to pass certification exams.

Also, as you know, the advent of State teacher testing has produced some shocking evidence of poor performance by some institutions. In one State, as many as 70 percent of the graduates of certain accredited teacher training colleges fail the National Teacher Examination.

There is also widening agreement that the quality of undergraduate liberal arts education at many institutions is not what it should be. As you know, I have a special interest in this.

We have all heard reports that many of our graduates do not possess the knowledge, the skills, or in some cases the civic virtues that we would like to associate with a highly educated person. Some evidence is fragmentary, ancedotal, or impressionistic; other evidence is more tangible: student performance declined in 11 of 15 major subject area tests of the Graduate Record Examination between 1964 and 1982.

As you know—and I know you have read them—we have seen five major reports in just over 1 year that have been critical of various aspects of undergraduate education. But while construed by some as an indictment of higher education, these reports are in my view, in fact, a promising sign. They are promising because these reports are by the members of the higher education community to its members, and it is the members of the Academy who must take the lead to solve these problems.

Let me say a word about State government responsibility. Because they are responsible for licensing or otherwise recognizing the educational institutions that operate within their borders, State governments play an essential role in any effort to improve the accountability of postsecondary education. On a national level, for example, the National Governors Association has identified raising standards in higher education as one of its major initiatives for the next 5 years.

Value-added testing, or testing at entry and graduation, is beginning to gain acceptance in a number of States. State coordinating boards in South Dakota and Tennessee already require this form of outcome assessment. I was in Tennessee last week and spoke to higher education officials there about their program.

Colorado, New Jersey, Maryland, and Virginia are considering value-added proposals. In addition, Florida in 1982 adopted a "Rising Junior" examination policy. This policy requires that all students from community colleges or in State colleges or universities pass the Florida College Level Academic Skills Test before being given junior class status.

Finally, Tennessee, as I mentioned earlier, is currently employing a performance funding program that uses assessment as a way of making decisions about a portion of higher education funding. It rewards institutions for performance on established criteria.

Although the Department of Education is prohibited by law—and I think properly so—from prescribing the curriculum of any school, college, or university, the Department is required by law to determine the eligibility of institutions to receive Federal funds. Rather than evaluate thousands of separate schools, the Federal Government relies upon the private and voluntary accrediting bodies through which the postsecondary community determines its own institutional membership.

In order to be recognized, an accrediting agency must demonstrate that it is capable of evaluating the educational quality of an institution by virtue of meeting 10 criteria. The National Advisory Committee on Accreditation and Institutional Eligibility, a group established by statute and appointed by the Secretary, is responsible for advising me as to whether an accrediting agency meets those criteria and also for advising me as to the content of the criteria. There are now 83 accrediting organizations recognized by the Department, and they confer their approval on nearly 9,000 institutions.

Accreditation standards, following the standards most commonly used by institutions themselves, have traditionally measured quality in terms of institutional resources such as endowment per student, percentage of faculty with doctorates, or the number of books in the library. But they have done so with little or no attention paid as to what effects they have or what results they actually yield. A 1978 survey of 208 colleges and universities that had engaged in institutional self-studies in preparation for accreditation visits found that only one in three had either generated or examined data on student learning and growth. Only 23 percent had examined students' knowledge in their major fields.

I believe that accrediting agencies and postsecondary institutions themselves should place as much emphasis on student learning as on the resources and procedures of the institution. Unless they examine student learning, they cannot really gauge educational quality.

I am concerned that the criteria for determining whether an accrediting agency should be recognized by the Department—last revised in 1974—and the Department's procedures for determining eligibility for recognition may no longer be adequate to their important task. Consequently, I will ask the National Advisory Com-

mittee on Accreditation and Institutional Eligibility to conduct a review of the current criteria for recognizing national accrediting agencies and associations, and also to examine the Federal process of recognition to determine whether and how these can be strengthened. I will also ask the committee to examine the statutory definition of institutional eligibility and report to me their recommendations for improvements within the limits of our statutory authority. I welcome additional discussion on this subject by the postsecondary education community, by the public, and by legislators at all levels.

In conclusion, Mr. Chairman, improving the quality of postsecondary education will require the cooperation of the faculties, administrators and trustees of individual institutions, State governments, accrediting organizations, and the Federal Government. But the primary responsibility must rest with the institutions themselves. Only they have power to turn the lofty statements of catalogs into actual classroom practice. If we are to keep our promises to students, we must be willing honestly to assess our strengths and our shortcomings. Such acknowledgement is the surest way to maintain institutional integrity; it is also the best way to maintain institutional sovereignty and self-government.

Today, Mr. Chairman, you are sending a message to the postsecondary education community that we in the Federal Government share their concern for quality. I thank you for this opportunity to appear before the subcommittee, and I look forward to working with you and with others to improve the accreditation process and the overall quality of postsecondary education.

Finally, if I may, Mr. Chairman, just a footnote. I note that the Southern Association of Colleges and Schools is present here today, and I want to commend you for inviting them and commend them for being here. They have taken a leadership role, I think, a very important and promising role in this whole area. They are quite serious, and I am delighted that they are appearing before your committee.

Thank you.

[The prepared statement of Secretary Bennett follows:]

TESTIMONY OF

WILLIAM J. BENNETT

Secretary of Education
U.S. Department of Education

Presented Before
The Committee on Labor and Human Resources
Subcommittee on Education, Arts, and the Humanities
United States Senate

January 28, 1986

Mr. Chairman and members of the committee, I am pleased to have this opportunity to testify before your Subcommittee on the accreditation of postsecondary institutions. In order properly to consider this topic, however, it should be placed within the context of broader issues concerning the quality of postsecondary education. So I will discuss both the particular issue of accreditation and the broader issue of quality in my remarks today.

## THE ACHIEVEMENT OF AMERICAN POSTSECONDARY EDUCATION

Let me say at the outset that our nation has created the world's finest system of postsecondary education. At its best, it combines the finest research and teaching with the greatest variety of educational programs available anywhere. It offers more choices, more second chances, and more intellectual freedom to students and their teachers than any other system of education in all of history. It is a system composed of universities, colleges, junior colleges, trade schools, and professional

and technical schools of almost every description. Together they provide our citizens with multiple opportunities to tailor an educational program to their changing goals and circumstances throughout life.

Today 62 percent of American high school graduates go on to enroll in postsecondary institutions, with total enrollments at almost 18 million. Expenditures by postsecondary institutions have nearly doubled since 1966; they totalled $90 billion in 1984. Funding from federal, state, and local governments accounted for almost half this total--$44 billion in 1984, up from $26 billion in 1966 when adjusted for inflation. The private sector has also provided substantial and steadily increasing support for postsecondary education. Last year private giving to higher education totaled $5.6 billion, including $1.25 billion from American corporations and $1 billion from foundations.

It is clear that the American people have been generous to our institutions of postsecondary education. This generosity derives from the knowledge that these institutions are an indispensable foundation of our economic progress and national well-being, and from the firm belief that they offer a gateway to the American dream. But, given the importance and the growing cost of postsecondary education, it is only reasonable that students, parents, government officials, and others should look for -- and should expect to find --evidence that they are getting their money's worth. This is a particularly important matter for students from less financially fortunate homes,



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students for whom postsecondary education may be a crucial avenue to success.

This morning, I would like to discuss signs of inadequate quality in postsecondary education; evidence of practices that ill-serve students and taxpayers; some indicators that the postsecondary education community is beginning to work on behalf of quality improvement; and what I believe may be the largest single challenge facing our postsecondary education system, namely the development of very substantially improved mechanisms for determining whether its institutions are in fact achieving the results to which they aspire.

Then I will talk about where responsibility for quality improvement lies, emphasizing that the primary burden should be borne by the institutions themselves, by voluntary mechanisms of the postsecondary education community such as accreditation, and by the states. Finally, I will review some ways in which the federal government may be able to help in these matters, paying particular attention to the complex system by which we rely on private accreditation as a major indicator of eligiblity for federal financial assistance of many kinds.

## CHALLENGES TO THE QUALITY OF POSTSECONDARY EDUCATION

As I said at the beginning of my remarks, many students receive an excellent education from our postsecondary institutions. But the health and vitality of these institutions depend upon the creation and maintenance of rigorous standards of achievement for students, faculty members, and institutions

themselves. From a growing number of sources, both inside and outside the walls of the academy, concern has recently been expressed that many of our institutions of postsecondary education are not establishing or applying suitable standards of quality.

1. Areas of Concern in Vocational and Professional Education

Among the diverse parts of our postsecondary education system different problems have been identified. A 1984 General Accounting Office study of proprietary schools found that many do not establish or enforce meaningful "ability to benefit" standards. The Higher Education Act requires that students admitted to postsecondary institutions have either a high school diploma, its equivalent, or -- in lieu of these --the "ability to benefit" from the training offered. But when 61 percent of Pell grant recipients admitted under the "ability to benefit" clause do not complete their educational programs, one can wonder how vigorously this standard is being applied. The GAO study also found situations where federal aid recipients who had never graduated from high school enrolled on the "ability to benefit" basis -- but then had in fact no chance to benefit from the training, because state licensing standards for employment in their field required a high school diploma.

Audit reports and program reviews, as well as other indicators, suggest that some institutions have been admitting students without adequately assessing their ability. The program reviews conducted by the Department of Education show

that many institutions do not give admissions tests or conduct other assessments of ability. Even in instances where admission tests are given, they are sometimes geared to third and fourth grade level questions. Often there is no relationship between the test and the educational subject matter the institution is offering; often passing scores have never been defined.

In an effort to address this problem, the Department submitted legislation with its FY 1986 Budget Proposal to allow only students with high school diplomas to qualify for financial aid, thus eliminating the "ability to benefit" exception provided in the law. This has yet to be enacted.

A related problem is the fact that some proprietary schools, accredited by the state or by accrediting agencies, are graduating large numbers of students who fail the relevant state licensing examination. Without their professional license, these graduates cannot find employment.

Indeed, this problem, whether due to lax admissions standards or inadequate instruction, is not limited to vocational or proprietary institutions. Some colleges and universities also graduate large numbers of students from such professional programs as accounting and pharmacy who are unable to pass certification examinations. Also, the advent of state teacher testing has produced shocking evidence of poor performance by some institutions. In some states, as many as 70 percent of the graduates of certain accredited teacher training colleges fail the National Teacher Examination.

Institutions are defrauding students, and in many cases

they are ripping off the American public, when they admit individuals who are manifestly unprepared for the work that will be required of them, or when they graduate students who cannot satisfy minimum standards in their field of study.

2. The Decline in Quality of Undergraduate Education

There is also widening agreement that the quality of undergraduate liberal arts education at many institutions is not what it should be.

We have all heard reports that many of our graduates do not possess the knowledge, skills, or, in some cases the civic virtues of a highly educated person. Some evidence is fragmentary, anecdotal, or impressionistic; other evidence is more tangible: student performance declined in 11 of 15 major Subject Area Tests of the Graduate Record Examinations between 1964 and 1982.

We have seen five major reports in just over one year that have been critical of various aspects of undergraduate education. These reports contain some troubling findings. For example, a 1984-85 survey by the American Council on Education indicates that a student can obtain a bachelor's degree from 72 percent of all American colleges and universities without having studied American literature and history; from 75 percent without having studied European history; and from 86 percent without having studied the civilizations of classical Greece and Rome. The Modern Language Association reports that, in 1966, 89 percent of all institutions required foreign language study for

the bachelor's degree; this dropped to 53 percent in 1975, and to 47 percent in 1983.

As the recent Association of American Colleges report ("Integrity in the College Curriculum") states, higher education has gone through a period in which there seemed to be more confidence "about the length of college education than its content and purpose." The simple accumulation of credit hours -- what is sometimes called "seat time" -- became the primary yardstick. The neglect of the real purposes and goals of education strikes at the very integrity of higher education.

I am encouraged by the signs that our colleges and universities are now recognizing the need to improve the quality of undergraduate education. For, while construed by some as an indictment of higher education, these reports are, in fact, a promising sign. They have recognized the danger of declining quality and provided guidance on how the problems can be overcome. These reports are, for the most part, products of the academy. They are by its members to its members, and it is the members of the academy who must take the lead to solve these problems.

## THE IMPORTANCE OF ASSESSMENT

I therefore believe that the quality of postsecondary education must be improved, but also that the primary force for that improvement must come from the institutions themselves. These institutions, and particularly our traditional colleges and universities, must do a better job of providing a coherent

and rigorous curriculum for students. They must do a more conscientious job of stating their goals, of gauging their own success in relation to those goals, and of making their results available to everyone -- students, prospective students, parents, citizens, and taxpayers. As a recent report by the Association of American Colleges stated:

> As difficult as it may be to develop the most searching and appropriate methods of evaluation and assessment, an institution that lacks refined instruments of program evaluation and rigorous instruments of student assessment is contributing to the debasement of baccalaureate education.

Apart from the essential skills and fundamental knowledge that we expect all colleges and universities to impart, there are individual institutional goals that vary enormously from school to school. It is only sensible that each school appraise its own progress toward those goals. This is the surest way to turn the lofty statements of college catalogues into actual classroom practice. If we are to keep our promises to students, we must be willing to honestly assess our strengths --and our shortcomings. Such acknowledgment is the surest way to maintain institutional integrity; it is also the best way to maintain institutional sovereignty and self-government.

Some institutions of higher education are in fact beginning to assess student outcomes as a means of assessing learning. While their methods vary, colleges and universities are beginning to set competency levels in certain content areas that must be met before a student can be promoted. For example, the University of Arizona requires all students to pass a writing proficiency examination near the mid-point of their undergradu-

ate career, and the University of Massachusetts at Boston requires undergraduates to pass a writing proficiency examination before they can take upper-division courses.

Assessments can use many different methods--standardized tests, interviews, questionaires, reviews of students' written work over four years, reviews of extracurricular activity, studies of alumni and dropouts, surveys of students' use of time, and surveys of graduates' use of time. Some results could be expressed in numerical terms; many obviously could not. In large, complex universities, assessment might be conducted separately by schools, colleges, or departments.

But no matter what the form, judgments need to be made so that institutions can assure the public and themselves that they are doing what they say they are doing. Such assessment should also hold a central place in the accreditation of all postsecondary institutions. Today that is not the case.

## STATE GOVERNMENT RESPONSIBILITIES

Because they are responsible for licensing, or otherwise recognizing, the educational institutions that operate within their borders, state governments also play an essential role in any effort to improve the accountability of postsecondary education. A number of states have recently begun to take action to assure that their institutions meet tougher standards of educational quality. On the national level, the National Governors Association (NGA) has identified raising standards in higher education as one of its major initiatives for the next

five years. Governor John Ashcroft of Missouri, who chairs NGA's College Quality task force, has resolved to investigate what States can do to improve consumer information about higher education, the assessment of undergraduate performance, and institutional management. NGA hearings next month will focus on postsecondary assessment. Governor Thomas Kean of New Jersey has said that the Education Commission of the States should "think deeply about how to inspire effective State action to improve undergraduate education."

One of the strategies some States are adopting for strengthening higher education is mandating requirements for evaluating student performance. "Value-added" testing, or testing at entry and graduation, is beginning to gain acceptance in a number of States. State coordinating boards in South Dakota and Tennessee already require this form of outcome assessment. Colorado, New Jersey, Maryland, and Virginia are considering value-added proposals.

In 1982, Florida adopted a "rising junior" examination policy. This policy requires that all students from community colleges or in State colleges or universities pass the Florida College Level Academic Skills Test before being given junior class status. The requirement has been expanded to private college students who receive financial aid from State sources.

State governments are also beginning to take important steps to promote excellence by awarding a portion of their financial support to colleges and universities on the basis of reliable measures of institutional quality. Tennessee is

currently employing a performance funding program that uses assessment as a way of making decisions about a portion of higher education funding. It rewards institutions for performance on established criteria. This effort emphasizes student learning in general education, student learning in a major field, and other criteria.

REVIEWING ACCREDITATION STANDARDS

Although the Department of Education is prohibited by law -- and properly so -- from prescribing the curriculum of any school, college, or university, the Department is required by law to determine the eligibililty of institutions to receive federal funds. Rather than eva.uate thousands of separate schools, the federal government relies upon the private and voluntary accrediting bodies through which the postsecondary community determines its own institutional membership.

The 1952 Korean War GI bill required the Commissioner of Education to establish a list of accrediting agencies that he determined "to be [a] reliable authority as to the quality of training offered by an educational institution." Although this list was not exclusive, the 1952 law established the principle that accreditation by a recognized private agency was sufficient to make an institution eligible for federal funds.

The 1958 National Defense Education Act provided that one way for an institution to participate in NDEA programs was for it to be "accredited by a nationally recognized accrediting agency or association." Although it left the responsibility of

"recognizing" accrediting bodies to the Commissioner of Education, NDEA again indicated Congress' intention to accept "accreditation" as established by nongovernmental agencies as a sufficient condition of quality assessment for eligibility for federal funds.

Today, to be recognized, an accrediting agency must demonstrate that it is capable of evaluating the educational quality of an institution by virtue of meeting ten criteria. The National Advisory Committee on Accreditation and Institutional Eligibility, a group established by statute and appointed by the Secretary, is responsible for advising me as to whether an accrediting agency meets those criteria, and also for advising me as to the content of the criteria. There are now 83 accrediting organizations recognized by the Department, and they confer their approval on nearly 9,000 institutions.

Accreditation standards, following the standards most commonly used by institutions themselves, have traditionally measured quality in terms of institutional resources -- such as endowment per student, percentage of faculty with doctorates, or the number of books in the library -- with little or no attention paid as to what effects they have or what results they yield. A 1978 survey of 208 colleges and universities that had engaged in institutional self-studies in preparation for accreditation visits found that only 1 in 3 had either generated or examined data on student learning and growth; only 23 percent had examined students' knowledge in their major fields.

I believe that accrediting agencies, and postsecondary

institutions themselves, should place as much emphasis on student learning as on the resources and procedures of the institution. Unless they examine student learning, they cannot really gauge educational quality.

Accrediting agencies and our colleges and universities must also reexamine the narrow vocationalism of some current professional requirements in order to restore scope and depth to liberal education. A clear distinction must be made between technical training and the broader goals of higher education so that a sound professional curriculum does not preclude rigorous standards in the general curriculum. In many cases, we have neither.

Thus the guidelines of one professional accrediting association confine one-half to two-thirds of one student's baccalaureate program to courses in two areas. Another association prescribes approximately 70 percent of the student's four-year program and confines that percentage wholly to two subject areas. And according to the standards of yet another association, the bachelor's degree programs must involve as much as 80 percent of the student's work in the professional field. As a result, some employers are confronting job applicants with a bachelor's degree who are unable to write competently, speak lucidly, or perform more than the most elementary mathematical procedures.

I am concerned that the criteria for determining whether an accrediting agency should be recognized by the Department --last revised in 1974 -- and the Department's procedures for

determining eligibility for recognition may no longer be adequate to their important task. Consequently, I will ask the National Advisory Committee on Accreditation and Institutional Eligibility to conduct a review of the current "Criteria for Recognizing National Accrediting Agencies and Associations" and also to examine the federal process of recognition to determine whether and how these can be strengthened. I will also ask the Committee to examine the statutory definition of institutional eligibility and report to me their recommendations for improvements within the limits of our statutory authority. I welcome additional discussion on this subject -- by the post-secondary education community, by the public, and by legislators at all levels.

At least one regional accrediting body has begun to assess the quality of higher education through the measurement of student outcomes, not just institutional resources. The Commission on Colleges of the Southern Association of Colleges and Schools, which is the regional association for postsecondary institutions in most southern states, has taken the lead in developing new quality criteria for its member institutions. The Southern Association requires institutions to evaluate the effectiveness of their resources and processes in achieving educational outcomes. In addition, institutions are encouraged to follow changes in the academic achievement of their students by tracking student scores on standardized examinations or locally constructed examinations, the performance of graduates in graduate school, and performance of graduates of professional

programs on licensing examinations.

While the Southern Association prescribes no uniform set of procedures or minimum standard for use by an institution, it should be commended for encouraging Southern colleges and universities to review their thinking about educational results.

OTHER INITIATIVES BY THE DEPARTMENT OF EDUCATION

The Department of Education is taking a number of steps to help improve the quality of postsecondary education. Our Office of Educational Research and Improvement (OERI) is working to improve its ability to provide the nation with accurate and timely information about the quality of education at all levels. Two of the 10 newly funded OERI Centers will be encouraged to foster better assessment measures. We will ask the new Center on Postsecondary Management and Governance to become a clearinghouse on State and institutional assessment activities and information, and the new Center on Postsecondary Teaching and Learning to develop new quality indicators.

In addition, we will assist institutions and others in their efforts to develop methods of assessment. Earlier this year the Fund for the Improvement of Postsecondary Education adopted the assessment of student learning and institutional effectiveness as one of its major funding priorities.

CONCLUSION

Improving the quality of postsecondary education will require the cooperation of the faculties, administrators, and

trustees of individual institutions, state governments, the accrediting organizations, and the federal government. In my remarks this morning, I have suggested some steps that each of these groups can take to meet the problems face by postsecondary education today. First, and foremost, individual institutions -- their, faculty, administrators, and trustees --can undertake a serious effort to assess and improve student learning. Second, state governments can examine their criteria and procedures for recognizing educational institutions. Third, accrediting agencies can take a hard look at their standards and practices. The Department of Education is eager to join with each of these groups in appropriate efforts to strengthen postsecondary institutions.

Today, Mr. Chairman, you are sending a message to the postsecondary education community that we in the federal government share their concern for quality. I thank you for this opportunity to appear before this Subcommittee, and I look forward to working with you and with others to improve the accreditation process and the overall quality of postsecondary education.

Senator STAFFORD. Thank you very much, Mr. Secretary, for a good statement, and without objection, we will place your entire prepared statement in the record as if read.

I have one or two questions, and then I will turn to my colleagues on the committee.

One of the ideas to improve the quality of higher education programs which has been considered by this Subcommittee is to somewhere require "truth in advertising" by higher education institutions which receive Federal aid. For example, if an institution is advertising for students by claiming its graduates all receive jobs, perhaps we should require that the actual statistics on job placement be published by the school in the catalog or other written material. Would you have any comment on an idea of that kind?

Secretary BENNETT. I would think that would be a good idea, Mr. Chairman. I think that is sensible, and puts the institution on the record in terms of what it advertises. So I would very much be behind that idea.

Senator STAFFORD. Thank you.

In the course of your statement to the committee, you responded to questions I had intended to ask on accreditation, so I will let those pass and turn to my colleague, Senator Pell.

Senator PELL. Thank you very much, Mr. Chairman.

In page 4 of your printed testimony, you mention that 61 percent of Pell grant recipients admitted under the "ability to benefit" clause do not complete their educational programs. What percentage of the total number who get grants make use of the "ability to benefit" as opposed to the high school diploma?

Secretary BENNETT. Dr. Carnes.

Dr. CARNES. Yes. We do not have a figure on how many institutions throughout the country admit students on "ability to benefit." This is obviously data which we ought to be collecting and which we are going to attempt to collect in the near future in the light of this concern.

Senator PELL. But if you have the figure for those under the "ability to benefit," you must have the figure for those admitted with a high school diploma. So it is 61 percent for one——

Dr. CARNES. I may have misunderstood your question, Senator. I thought the question was how many people are admitted throughout the country under "ability to benefit."

Senator PELL. No. My question was—you say 61 percent of the Pell Grant recipients admitted under the "ability to benefit" clause do not complete their programs. My question to you is what is the percentage of those admitted with a high school diploma who do not complete their programs, and what is the number. In other words, is this a tiny proportion of the total, or is this a substantially large portion?

Dr. CARNES. I do not know that answer right now, Senator. I will supply that for the record, unless one of my colleagues has it.[1]

Senator PELL. Good. Thank you very much.

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[1] See letter dated March 3, 1986, from the United States Department of Education on p. 31.

Senator PELL. My next question is one that the Secretary and I have discussed privately, but I would be interested in his views here at this open hearing.

What can be done to improve not only the quality of education, but to develop the character of the students as they are at schools and at colleges? For example, how many colleges give their examinations under an honor system? What other methods can be used to improve the character as well as the education, because as I mentioned earlier, the strength of our Nation is based not just on the brainpower; it is also based on the character and the motivation of the people with the brainpower. I can find very intelligent people at the local penitentiary. The important thing is how you improve the character as well.

Secretary BENNETT. Well, sir, that is a——

Senator PELL. A philosophic question.

Secretary BENNETT. Yes, sir, it is a philosophical issue, so is welcome, but in the interest of time, let me be restrained in my answer.

I think it is fair to say that most educational institutions, certainly most colleges and universities, have within their statement of purpose, if one looks at that statement of purpose, something that speaks not only to the mind of the student, but if you will to the heart of the student and the habits of the student. I was pleased to see a number of recent reports talking about citizenship in general as a goal and end of college and university education.

My guess is that for the present and for the future, we ought, I suppose, to be attentive to the same kinds of things that we have seen at work in the past. I think it is an expectation, though not always articulated by parents, that as a result of a college education, their sons or daughters will not only become smarter and more intelligent, but in some ways will develop more exemplary behavior, will become better human beings.

To me, there is no substitute, if that is the end, for the example of the faculty, the example of the men and women with whom the student comes into contact. So, what is required? Well, I suppose what is required is attention to the sort of men and women who are on our faculties, who are deans and provosts and presidents, and the kind of contact and the kind of availability of the faculty to students.

You know, up until not too many years ago, a common practice at American colleges and universities was for the president of the college or university—this started in New England, and I know you are familiar with it—was for the president of the college or university to teach a course to all the seniors on—oh, it was usually something about the conduct of one's life and one's career. "The Moral Life" was a seminar that many university presidents used to teach. I do not think we can say that is typical today. But there was an emphasis not only in the catalog but in the day-to-day life of the university on aspects of character, as you put it.

I think honor codes, the restoration of honor codes at many institutions, we are seeing that this is making a comeback, and other measures.

Senator PELL. What are the figures on that? What is the percentage of institutions of higher learning that have an honor code?

Secretary BENNETT. I cannot tell you, but let me see if I can find out.

[Information supplied for the record follows:]

UNITED STATES DEPARTMENT OF EDUCATION

THE SECRETARY

MAR 3 1986

Honorable Claiborne Pell
United States Senate
Washington, D.C. 20510

Dear Senator Pell:

During the January 28 hearing on the accreditation of postsecondary institutions before the Subcommittee on Education, Arts, and Humanities, you asked that I respond for the record to the following questions.

Question 1: How many colleges and universities have honor codes?

**Response:** To our knowledge, the only major survey of collegiate honor codes was conducted in 1985 by Brian Melendez, Research Assistant to the Secretary of the Faculty of Arts and Science at Harvard University. He surveyed some of the most selective institutions of higher education in the Nation, listed in Barron's Guide to Colleges and Universities. Institutions with honor codes are mostly private, elite institutions, e.g., Bryn Mawr, Wesleyan, Princeton; a few public ones (University of Virginia); and the service academies.

Of the 68 schools responding, 32 schools or 47 percent reported having an honor code. The frequency of having an honor code would drop if less selective four-year and two-year schools were included. Survey results listing schools with honor codes and descriptions of the codes are enclosed.

Question 2a: What is the percentage of Pell recipients with high school diplomas or GED's who are admitted to proprietary schools and who do not finish their educational programs?

**Response:** The 1984 GAO study (HDR 84-17) reported a drop-out rate in the 1980-81 program year of 47 percent of Pell recipients who have a high school diploma or GED. It also indicated that 61 percent of Pell recipients a diploma or GED dropped out.

Question 2b: What percent of Pell recipients in all postsecondary institutions did not complete their degree?

Response: The only recent nationally available information on attrition of Pell grant recipients is from the High School and Beyond study. The data indicate the percentages of students with a high school diploma who leave college between their freshman and sophomore years. The data show that 22 percent of Pell recipients in two-year colleges and 11 percent in four-year institutions did not return for the second year. These percentages are within one or two points of the attrition rates among non-recipients.

Dropout rates for students in both two-year and four-year institutions would increase with each additional year of schooling, although these specific rates are not yet available.

Data are not yet available from the High School and Beyond study on attrition rates of those students who enroll in postsecondary education on an ability-to-benefit basis.

I hope that you find this information useful. I share your concern about character-building in the educational process as well as quality and access in postsecondary education. I look forward to working with you and other Subcommittee members on these important issues.

Sincerely,

William J. Bennett

Enclosures

cc: Senator Robert T. Stafford

TABLE 2
HONOR-CODE SCHOOLS

Each school was asked, "Does your institution now have an honor code, or has it ever had one?" The 32 schools listed below met this study's definition of an honor code.* The table below indicates which of the following features each code exhibits.

> Unproctored examinations: a uniform requirement that academic honesty in a final examination be enforced only by the voluntary cooperation of each student being examined.
>
> Pledge: a signed statement required from each student that he or she will act or has acted honorably in the preparation of work to be accepted for academic credit or evaluation.
>
> Reportage: an obligation placed upon each student not to tolerate any infraction of honor by a fellow member of the community.
>
> Court: a peer judiciary whose primary concern is the infraction of honor by students. A "peer judiciary" means a body with investigative or disciplinary powers where (1) a student serves as chairperson, (2) student membership comprises a majority of the body, or (3) student consent is necessary or sufficient to change the constitution of the body.

Key: C = court
P = pledge
R = reportage**
UE = unproctored examinations
est = date of establishment

| School | C | P | R** | UE | est |
|---|---|---|---|---|---|
| Air Force Academy | C | P | R | | 1955 |
| Annapolis | C | P | | UE | 1951 |
| Barnard | C | P | | | 1912 |
| Bryn Mawr | C | | | UE | |
| Caltech | C | | | UE | 1925 |
| Coast Guard Academy | C | | R | | |

*Please see the Report at p. 3 for this definition.

**This table indicates only required reportage, where the failure to report an infraction was itself a violation.

| School | C | P | R | UE | est |
|---|---|---|---|---|---|
| Colorado College | C | P | | UE | 1948 |
| Connecticut College | | P | | UE | 1911 |
| Dartmouth | | | | UE | 1962 |
| Hamilton | C | P | | | 1908 |
| Haverford | C | P | R | UE | 1897 |
| Kalamazoo | | P | | | |
| Kings Point | C | | | | 1943 |
| Michigan Engineering | C | P | | UE | 1915 |
| Middlebury | | P | | UE | |
| Mount Holyoke | | | | UE | |
| Oberlin | C | P | | UE | 1909 |
| Penn* | C | | | | |
| Princeton | C | P | | UE | 1893 |
| Rice | | P | | UE | 1911 |
| Smith | C | | | | 1944 |
| Stanford | | | | UE | 1921 |
| Vanderbilt | C | P | R | | 1875 |
| Virginia | C | P | | UE | 1842 |
| Wake Forest | C | P | | | |
| Washington and Lee | C | P | | UE | 1865 |
| Webb Institute | C | P | | | |
| Wellesley | | | | UE | 1919 |
| Wesleyan | C | P | R | | 1893 |
| West Point | C | | R | | |
| William and Mary | | P | | UE | 1779 |
| Williams | C | P | | | |
| | 18 | 20 | 5 | 17 | |

Summary:
- 3 court only
- 1 pledge only
- 0 reportage only
- 4 unproctored examinations only
- 8 one feature only
- 13 two features
- 10 three features
- 1 four features
- 32 honor-code schools responding

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*Penn, despite its reply that "At the current time, the University of Pennsylvania does not have, in a strict sense, an 'honor code,'"<2> was classified as an honor-code school because its Honor Court meets the definition of a peer judiciary.

Senator PELL. How is it expanding? I would be interested to know the figures, and if it really is expanding.

Secretary BENNETT. I think it is. I think this is something that many leaders in higher education have felt has become lost or relatively neglected and needs to be reaffirmed as a goal of the institution.

Senator PELL. I noticed with some surprise some years ago that, while they have an honor code at the Naval Academy, when it comes to the OCS, where they are dealing with officers from private institutions, they do not believe an honor code would work.

Secretary BENNETT. Yes.

Senator PELL. And that is a reflection on the private institutions, I think. Anyway, I would be interested in those figures.

Also I would be interested in your thoughts as to whether the National Commission on Accreditation Assessment is not only a valid idea but a necessary idea and could take quite a lot of the load off the Department.

Secretary BENNETT. Do I think a new National Commission——

Senator PELL. Yes.

Secretary BENNETT. Well, it could take some load off the Department. But it seems to me the statutory requirement for the Secretary of Education is appropriate, that is, that I am required to vouch for the reliability of standards used. I think it is appropriate for the Congress to have said this to the Commissioner, now Secretary of Education, that given the large amount of Federal funds we are talking about that Senator Stafford mentioned, that the Department should have some interest in vouching here for reliability. But again, I would be delighted if our vouching, our saying that standards used are reliable and that they are exercised with due diligence, I would be delighted if that were really a pro forma matter for us. That is, I would be delighted if we could have enough faith and confidence in the integrity—start with the individual institutions, and second, with the bodies that accredit and evaluate, that we would not have to make any more than a passing glance.

The reason that I have expressed interest in this, and I suppose the same reason that the hearing was called, is that many of us fear that the necessary regeneration on the part of institutions themselves is not proceeding at the pace that it should.

But let me say again that there are some very promising signs from the higher education community, postsecondary education community, and I am, as I have said, quite impressed with the kind of leadership that a group like the Southern Association has shown.

As long as there is a large amount of Federal funds, I do not think you should ever relieve the Secretary of some responsibility. But the unfortunate thing would be if more of the momentum were coming from the Federal Government or State government than from institutions themselves or the organizations that represent them. I am happy to say that is not the case, but I think at this moment it is a good time for us to work together.

We have been talking about this problem of accreditation for some 20 years now, and I think we have an opportunity, given the

degree of interest and attention the issue has drawn, finally, to do something about it.

I am sorry to be so long-winded.

Senator STAFFORD. Mr. Secretary, with the indulgence of Senator Pell, could you expand your answer here to indicate to the committee what role the Department now conducts in terms of oversight of accrediting agencies?

Secretary BENNETT. Yes. I have a National Advisory Committee, as you know. What I do in consultation with that committee is essentially say that the accrediting bodies are reliable institutions; that is, the bodies that perform the accreditation process are reliable institutions for doing this and that the kinds of measures they use are the sensible and appropriate measures to use. This is action at a distance on the part of the Secretary, but I think that is appropriate. Again, we do not want the Federal Government looking over every nit and jot of an institution's program. This should be left to others. But I take it in the push and pull that we are now experiencing, we are pushing a little bit. And as I have said, I will ask my Advisory Committee whether we should take another hard look at the criteria we use when we say the institutions are reliable accreditors.

My hope is that we can meet halfway; that if we say at the level of the Federal Government, look, we want to look a little harder and maybe urge you to look a little harder, that we can meet those from the associations coming from the other direction saying, we recognize that perhaps we have not exercised the scrutiny that we should.

So I think this very hearing itself can accomplish a great deal along these lines.

Senator STAFFORD. Thank you very much.

Senator PELL. Thank you. Following up there, will you ask your Advisory Commission to measure the amount of student learning, as measurable as that is, in giving their report to you?

Secretary BENNETT. Well, I will ask the committee to consider whether this is something we want explicitly to ask the accrediting bodies to look at. Again, this is the odd sort of business of my authority, and quite properly so, which is general and not specific. So I think that I have raised the question of outcome standards, outcome results, the measurement of learning. I think this is clearly on the record. I think there is something of a consensus that we need to look more in this direction. I cannot specifically require that the accrediting bodies do that—is that right, Dr. Finn——

Dr. FINN. Correct.

Secretary BENNETT [continuing]. But I can certainly urge that they take this into account.

If you look at accreditation, the literature on accreditation, of which I have read a fair amount now, you will see a great deal of emphasis on structure and process; how many professors are there, how many courses are offered. What we are saying is would it be a good idea in light of public concern to expand the number of things you look at from structure and process to also include student outcomes or learning assessment. But that would have to be by way of suggestion.

Senator PELL. Thank you.

What is your opinion of the "Accuracy in Academia" movement? Do you feel this organization, which encourages students to monitor professors who teach left-wing subjects should be broadened to include monitoring those who teach right-wing subjects, or should it be phased out, or should it be continued and encouraged?

Secretary BENNETT. Well, my own particular view is that this is not a particularly valuable instrument of assessment. It is certainly not an instrument of accreditation under the heading of today's hearing. I do not think this is a worthwhile instrument of assessment.

If we were to believe that the untutored, that is, the students, could reliably sit in judgment on their professors, there would not be much reason for us sending them on to college or university. That is one major objection I have.

Senator PELL. We would make the students the professors and the professors the students.

Secretary BENNETT. That is right. I also think of that professor whose name I cannot remember, a great professor of political philosophy at Harvard in the twenties or thirties, or thirties or forties, I guess, and he taught a year-long course in political theory. And the first semester it was socialism and Marxism, and the second semester it was Democratic Theory. And the legend is that students who dropped the course at mid-term became very left-wing, and those who finished the course ended up pretty balanced in their perspective. The professor was an advocate of one point of view for 5 months and then took the opposite point of view the second 5 months.

Senator STAFFORD. What about those who only took the second semester? [Laughter.]

Secretary BENNETT. Well, I am not sure you could just take the second semester. You could not take the second semester first, in any case.

Senator PELL. Thank you very much.

Senator STAFFORD. Senator Simon.

Senator SIMON. Thank you, Mr. Chairman. Some of those who took the second semester ended up on your side of the aisle in the Senate. [Laughter.]

Senator SIMON. One of the realities, Mr. Secretary, and why this is important, is that the trend is clear that we simply are not going to have the volume of students, and the pressure is going to be on schools to lower their standards, admission standards, and I fear as you lower admission standards, you lower graduation standards. And that is why I think it is really imperative that the Department and Congress make clear to all institutions that maintaining high standards is important. And I am pleased that in the State of Illinois, the State Board of Education is moving toward—has moved toward—requiring higher standards for admission to our State institutions.

In your statement, you say, "The advent of State teacher testing has produced shocking evidence of poor performance by some institutions," and so forth. In your opinion, are we improving now, is it getting worse—where are we?

Secretary BENNETT. I am not sure I can say it is getting worse, but I certainly know I cannot say it is getting better, precisely for

the reasons you cite, Senator. That is, I think the kinds of pressures—you know, we have seen a growth in the number of postsecondary institutions, not a decline. There are more institutions out there than there have ever been before, and yet the number of students eligible by the demographics, the usual pool, is somewhat smaller now. So institutions want to reach out to fill their halls, and there is the temptation, to lower standards not just for admission, but for graduation.

I think the situation is sufficiently alarming that it warrants this committee's attention and others' attention as well.

In terms of whether it is better or worse, Dr. Finn do you have a sense of that? Dr. Finn is in charge of our research effort, and he may have some numbers.

Dr. FINN. I think we do not have satisfactory numbers yet. If I could use a medical analogy, we do not yet know whether there is more fever, but we do now have a few more thermometers in use, which is one of the reasons why the kinds of data that you cited, Senator, with respect to teacher exam results, are now becoming available. They were not available before, because teachers by and large were not examined upon exit from their teacher training programs. But it is too soon to know whether there has been actual measurable improvement. I certainly agree with the Secretary that it does not appear to be getting worse.

Senator SIMON. What is your instinct?

Dr. FINN. My instinct is that we are seeing signs of improvement, because people are paying more attention to outcomes than they were, say, 5 years ago, and therefore are working toward them.

Senator SIMON. The chairman mentioned the advertising problem, and you mentioned the foreign language thing. I see these ads saying, "Speak French like a diplomat." You know, you just buy something, and in 3 weeks, you can speak French like a diplomat. What they do not say is that we have the only Foreign Service in the world where you can get into Foreign Service without speaking any foreign language.

And I would simply point out that one minor statistical—it is not an error, but it is not completely accurate—you say, "The Modern Language Association reports that in 1966, 89 percent of all institutions required foreign language study for the bachelor's degree. This dropped to 53 percent in 1975 and to 47 percent in 1983." In fact, that is for the bachelor of arts degree. For those who uniformly require foreign language for anyone who graduates, it is—I do not remember the figure, but it is around 10 or 11 percent. It is a very, very low percent. We have the only school system in the world where you go through grade school, high school, college, get a Ph.D., and never have a year of a foreign language. And that says something about quality.

Obviously, the quality problem also relates to what we are demanding in our secondary schools and our elementary schools. You cannot put postsecondary institutions in isolation away from elementary and secondary schools that simply have not been demanding enough—and we have not been demanding enough.

If I can just use one illustration, when you graduate from secondary schools in the Soviet Union, you have 4 years of physics. Six-

teen percent of those who graduate from high school in the United States have 1 year of physics. We have more school districts in the United States than we have physics teachers. Clearly, that is going to have to change if we are going to remain competitive in the world in which we live.

But I would simply add, I applaud your efforts to look at this, and I think it is important that as we spend money here, that we get the bang for the buck that the people deserve.

Secretary BENNETT. If I may comment briefly on those very well-taken remarks.

Senator SIMON. Yes.

Secretary BENNETT. There is a problem that I guess we as a nation have to decide, and it really does focus on this question of access. There is access in the sense that we talked about earlier, that is, the ability to pay for a college education. There is then access in terms of what one has to demonstrate one knows in order to be able to go on to a college or university. And here, we simply have to, I think, decide what we want to do. You bring up the area of foreign languages, which you know is a concern of mine, and was for some time at the National Endowment for the Humanities, and we did a lot of work there.

If you look through the education literature, often, you cannot find easy answers to things, but I think one answer did sort of strike me in this whole debate about foreign languages. Why did secondary schools stop requiring foreign languages? And one of the reasons is that colleges stopped requiring them as a condition of matriculation.

Now, if States are making efforts along the lines that I think you would support, say, to put in the new basics of the Commission on Excellence, 3 years of science if not 4, 4 years of math, 4 years of English, what sanctions, if you will, are there, or what inducements are there? Well, the legislature may just say you do not get your diploma. But it seems to me exactly right—here is where the colleges and universities have to help. They have to say, "We are behind the State legislature. We are behind the people in the schools here who are trying to create a sensible curriculum. And we are so much behind it that we will say you cannot matriculate at a State institution unless you can show that you have taken these courses."

I think we are so much committed to the idea of equal opportunity and giving everyone a chance, that if we slide, we sometimes slide to the extent tbat we do not say enough about the conditions of continuation, that is, that one ought to be able to show that one has taken certain courses before one goes on to college. It is a very tough question, but one that we have to work together on. And I could not agree more that the colleges and universities must join this discussion.

We have been talking for 2 years pretty seriously about assessment and evaluation of elementary and secondary education, and the tools we have, as imperfect as they are, have given us, I think, something of a handle about how to improve elementary and secondary education. Now we invite higher education to join the conversation, and not just because we think their voice can help enlighten us, but because they are a part of it. And what we say for

13th and 14th and 15th grades matters a great deal, echoes a great deal, in grades K through 12. Yes, sir, I quite agree.

Senator SIMON. I thank you, Mr. Secretary.

Thank you, Mr. Chairman.

Senator STAFFORD. Thank you, Senator Simon.

Senator Pell, do you have further questions?

Senator PELL. Thank you, Mr. Chairman. Two brief questions, if I could.

You mentioned that various initiatives are being taken at the State level to bring up the quality of postsecondary education. Do you think there is any need for a national education that would seek to do the same thing, to be considered?

Secretary BENNETT. Yes, my guess is there may be. I could not specify here for you this morning, Senator, but I think along the lines of what Senator Stafford suggested in his first question to me, that the truth-in-advertising, that, plus issues like that—again, telling the truth, and what kinds of guarantees can we have that institutions are telling the truth about the product; some way of the Federal Government, without intruding into the proper province of the university, to be on the side of the consumer. Some consumer protection here would seem to me to be appropriate.

We would be happy to think about it, and obviously, we are looking forward to working with the committee. But I could not specify here this morning. I do think some earnest on the part of this committee and the Congress could go a long way.

Senator PELL. I must say I am very much in agreement with you on that.

And second, I have proposed for some time that there should be a voluntary achievement test available in high schools, somewhat akin to the New York Regents Test. This would be a voluntary test, administered by the Federal Government, written by the Federal Government, only given to those students who so request it.

What would be your opinion as to the value of such a test?

Secretary BENNETT. Did you say written by the Federal Government?

Senator PELL. Yes.

Secretary BENNETT. I would be very chary of that.

Senator PELL. Or if it was written by a commission reporting in to the Federal Government.

Secretary BENNETT. Better. I guess I am just reluctant of the Federal Government administering a test of that sort. But a national test could be devised, it seems to me, and our Department and our experts in the Office of Research could certainly help in the design of such a test.

Senator PELL. Who might administer it, in your view?

Secretary BENNETT. Well, may I ask Dr. Finn, who is our expert on these matters, to comment on that?

Senator PELL. Yes.

Secretary BENNETT. I think there has been a fair amount of discussion of this issue already, has there not?

Dr. FINN. Yes, sir.

Senator PELL. Well, I got thoroughly booed at one teachers' group where I recommended it, I remember.

Dr. FINN. As you know, Senator, we have now the National Assessment of Educational Progress, which is administered on a sample basis across the country. It is not the same as a voluntary achievement test, but it does yield up nationwide evidence as to whether people are learning reading, writing, arithmetic, and so on. Individual students are not identifiable here, but regions of the country are, and the chief State school officers have proposed that States should be able to be identifiable in this kind of comparison in the future. We are assisting them in that regard and think that is a very good move.

The voluntary achievement test at the student level is of course somewhat similar to the achievement test that the Educational Testing Service and the College Board currently make available on a voluntary paid basis for individual students. We could happily converse with them about additional mechanisms and would be happy to do so.

Senator PELL. Thank you.

Thank you very much, Mr. Chairman.

Senator STAFFORD. Thank you very much, Senator Pell.

Mr. Secretary, we really appreciate your appearance here with us this morning. I am sure we can look forward to some years of cooperating together, and we expect we will be back together in this room on other, less formal occasions, during the rest of this year and the next few years.

Thank you very much for coming, and thank your associates, also.

Senator PELL. I would like to associate myself with the chairman's statement and look forward as well to working with you.

Secretary BENNETT. Thank you.

May I tell one quick story, Senator?

Senator STAFFORD. Yes, indeed.

Secretary BENNETT. In the whole area of outcomes assessment and evaluation, one of the nicest examples I heard and a point of pride for us, I met with the winners in the International Olympics Competition in Vocational Education, the young man who won a gold medal in radio and TV repair—this is on the whole question of assessment. Sometimes it is easy. I said, "How did they determine that you got a gold medal?"

He said, "Well, they gave me three broken television sets and three broken radios. They gave the same broken TVs and radios to a Japanese student, the same to a German student, right on down the line, and I fixed them quicker than anybody else."

Now, that is outcomes assessment of the sort we can all understand and congratulate.

Senator STAFFORD. That is right.

Thanks again.

Secretary BENNETT. Thank you.

[Responses of Secretary Bennett to questions submitted by Senator Kennedy follow:]

Answers to Questions of Senator Edward M. Kennedy

Q. What role does the National Advisory Committee on Accreditation and Institutional Eligibility play in ensuring that postsecondary institutions provide quality education and that Federal aid is buying a good product for the student?

A. The Advisory Committee assists the Secretary of Education to fulfill his statutory obligation to publish a list of nationally recognized accrediting agencies and associations which the Secretary determines to be reliable authorities as to the quality of education offered by institutions and programs. The Committee recommends criteria for the recognition of such agencies by the Secretary and reviews applications for recognition from those agencies.

The Advisory Committee consists of 15 members from various sectors of the higher education community, appointed by the Secretary to advise on matters of institutional eligibility.

Q. In your testimony you discuss several initiatives on the part of States and postsecondary institutions to improve quality and accountability in higher education. What can the Federal Government do to compel all higher education institutions receiving federal aid to similarly examine their programs?

A. I have asked the National Advisory Committee on Accreditation and Institutional Eligibility to review the Federal role in accreditation. Although the primary responsibility for ensuring excellence in postsecondary education lies with academia itself, the Federal Government also has a responsibility to provide leadership and guidance as to sound educational policies, practices, and standards.

The Committee has been asked to arrive at a set of specific recommendations for revising the Secretary's "Criteria for Recognition." The Committee's recommendations will help to set a new direction in the assessment of educational quality to ensure that the taxpayers' future investments in postsecondary education are sound. There are several areas which should receive close scrutiny. First, we need to consider various means of better assessing the educational quality of institutions, including expanding the current practice of measuring institutional resources to include student achievement output measurements.

Second, the Committee will review the statutory definition of postsecondary institutions. This definition is a critical element in determining the types of institutions which receive Federal support; a review of accreditation would not be complete without a study of the institutions which make up the postsecondary education landscape. Finally, the Committee will examine ways in which accrediting agencies might be encouraged to more forcefully protect the rights of students and their families as "consumers" of education.

The Fund for the Improvement of Postsecondary Education has made two grants in the area of education outcomes assessment that will help institutions to examine their programs. One of these is a grant to UCLA as a convenor for seven colleges and universities to try and examine student learning gains through value-added assessments in the first two years of college. The other grant is for a project that will examine existing efforts utilizing outcomes assessment as a means to improve teaching and learning rather than as a mere screening device.

Also the research arm of the Department is funding activities that are aimed at stimulating higher education institutions to examine their programs in terms of their educational outcomes. Last year the Department sponsored a national conference at the University of South Carolina on the assessment of educational outcomes. Research is also being sponsored by the Department on improving assessment in postsecondary education and for the development of reliable indicators of quality in postsecondary education.

Q. Higher education institutions will be faced with declining enrollments in the near future. How can we guarantee that postsecondary institutions will not lower their standards to fill empty classrooms and that Federal student aid will continue to buy a high quality education for students?

A. We are working in several ways to upgrade the quality of education both through the Department's programs and by stimulating academia to examine its own policies and procedures. But the primary responsibility for maintaining standards and quality in postsecondary education must be borne by the institutions themselves, by voluntary mechanisms of the education community such as accreditation, and by the States monitoring the institutions they support or license. Also, we must not forget that the students and their parents provide the bulk of the financing. Our system of postsecondary education allows students to shop around for their education, and the institutions will have to respond to market conditions. While we recognize that the market is an imperfect one, it does have a large restraining effect on the institutions' temptation to lower their standards.

Q. The cost of higher education has risen dramatically over the past several years. What steps do you believe postsecondary institutions should take to begin to control these costs?

A. Over the 1981 to 1985 period the cost of a college education, as measured by the Higher Education Price Index, increased at a rate 65 percent higher than the increase in the Consumer Price Index for the same period. This kind of increase warrants close examination.

Many institutions can and do provide an effective and efficient educational program at a lower cost. Reduced costs have been achieved through the more efficient use of faculty, staff, and institutional resources. A number of institutions have reduced the frills, by which I mean programs or activities that are peripheral to the central educational mission of the institution, but not program quality. Yet, many other institutions have not controlled their cost.

Q. In your testimony you state "Institutions are defrauding students, and in many cases they are ripping off the American public,...".

- Would you please name the institutions you refer to as "defrauding students" or identify the number of institutions you believe are "ripping off the American public"?

- Would you please name the institutions that you have identified as admitting these unprepared individuals?

A. Many proprietary schools are doing a good job, but that is not a reason to let those which are not preparing students effectively escape criticism. As cited in my testimony, the General Accounting Office's August 1984 report on proprietary school administration of the Pell grant program identified some proprietary schools that admit students who had little likelihood of benefiting from the program. The schools typically admitted students under the so-called ability to benefit provision who were not high school graduates or the equivalent. Also, the report found that 83 percent of proprietary schools consistently failed to enforce academic progress standards. Twenty-two percent of the students in the sample were allowed to remain in school while making little progress toward successful completion of their training. The GAO estimated that of the 1,165 schools in its universe, 766 of them had misrepresented themselves during the recruitment process; 533 overstated job placement rates; 366 misrepresented scholarships; and 399 misrepresented themselves in advertising.

Q. You discuss the lack of liberal education in vocational and professional degree programs. You state that "some employers are confronting job applicants with a bachelor's degree who are unable to write competently, speak lucidly, or perform more than the most elementary mathematical procedures."

- What are the specific vocational or professional programs that you say graduate individuals who are unable to write, speak, or perform elementary mathematical procedures?

A. One example is the large number of graduates of our teacher training institutions who have been failing the National Teacher Examination. In Florida, up to 70 percent of the graduates of some accredited teacher training colleges failed the NTE. In New Hampshire, the board of education voted to lower passing scores on the Pre-Professional Skills Test (PPST) for prospective teachers because so many of them failed this test that the state now requires for teacher certification. Of the first 350 prospective teachers who have taken the test, 54 percent passed the reading section, 48 percent passed the math, and 25 percent passed the writing section. The PPST was originally developed by the Educational Testing Service for college sophomores who were entering teacher training programs. More generally, a 1982 survey of business executives conducted by the Association of American Colleges found that poor writing skills and inadequate verbal skills were the two greatest deficiencies in their recently hired executives.

Senator STAFFORD. We do have a panel scheduled for this morning consisting of Dr. James Rogers, executive director, Commission on Colleges, Southern Association of Colleges and Schools, Atlanta, GA, and Mr. C. Donald Sweeney, president, National Association of State Approving Agencies, Augusta, ME.

If those two gentlemen would come to the witness stand, we would appreciate it.

**STATEMENT OF DR. JAMES T. ROGERS, EXECUTIVE DIRECTOR, COMMISSION ON COLLEGES, SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS, ATLANTA, GA, AND C. DONALD SWEENEY, PRESIDENT, NATIONAL ASSOCIATION OF STATE APPROVING AGENCIES, AUGUSTA, ME**

Senator STAFFORD. Gentlemen, we thank you for coming to this committee meeting. We welcome you here. One of the more painful duties falling on a committee chairman in this place is to remind members that we would appreciate brevity in delivering statements, 5 minutes in summary, if possible. Any statement that you have prepared will be placed in the record as if read in full. We regret constraints on time because we know how much time and trouble you have gone to to be here with us. But as a disciple of Calvin Coolidge and having grown up close to where he was born, you can understand I enjoy brevity of expression.

Having said that, why don't we go in the order, if that is agreeable, in which we called your names, which would mean, Dr. Rogers, you would be the leadoff witness, followed by Mr. Sweeney.

Is that agreeable?

Dr. ROGERS. That is fine.

Mr. Chairman and members of the committee, I appreciate this opportunity that you have allowed me to come and briefly outline what we are doing in the Southern Association of Colleges and Schools, the accrediting group for the Southern States. I am not quite sure how familiar you are with the accrediting process in the country. There are 6 regions, and the Southern Association is in charge of the 11 Southern States, which would include Texas through Virginia and Florida through Kentucky.

We have about 785 institutions of higher learning in the Southern Association which we are responsible for.

Our association is organized a bit differently from some of the others. We have four commissions—there is a Commission on Elementary Education, one on Secondary, one on Vocational, and then the College Commission, which is the commission that I head as executive director.

First of all, let me bring you greetings from Atlanta, sunny Atlanta—which by the way, this morning, is about 20 degrees colder than Washington; we are not quite accustomed to that sort of cold weather in the South.

I do appreciate the nice comments the Secretary made about what we are doing in the Southern Association. I have prepared a statement here, which I will not attempt to read, but let me just share with you some general comments about what we are doing.

Senator STAFFORD. As I said, Doctor, that will appear in the record in full.

Dr. ROGERS. Yes, sir, fine. Thank you.

As the Secretary said a minute ago, the traditional mode for determining quality among colleges and universities in this country has been the accreditation process, the idea being that peers are better-equipped to evaluate peers and determine quality. And we see this in many of the professions—the medical profession, the law profession, education, et cetera, and you are quite familiar with that.

As we have looked at our standards, the criteria and the standards we have been using over the years, as we looked at those back around 1979, we realized that there was nothing in there that really spoke to the question of outcomes assessment. As the Secretary said a minute ago, our traditional approach to accreditation has been to look at resources, libraries, procedures, process, et cetera, and automatically make the assumption that the outcome was a valid outcome.

I think traditionally, what we have been looking at gives a statement about an institution's quality, but says very little about its effectiveness. And so what we have done in the Southern Association is to revamp our standards which we have been using since 1958, and we have come out with a new document which we call our criteria.

In the criteria, we have included one whole section dealing with the subject of outcomes assessment. But we have entitled it, "Institutional Effectiveness." When we started looking at this, we found that the term, "outcomes assessment," is one of those trigger words that triggers a negative response on the part of a lot of educators. They have the feeling—and this is all spelled out in the paper—that this is something you are prescribing, it is very restrictive, et cetera.

So our membership did not approve that concept when we initially presented the criteria. So we have a committee to restudy the whole concept, and we put it in a broader context, one of institutional planning and research and determining institutional effectiveness.

So the new section now does require that every institution look at itself not only in terms of its resources and processes, but also in terms of its effectiveness—how well is it doing essentially what it says it is doing. And we have never had anything quite as direct as that in our standards. The statement is very nonprescriptive. By that, I mean we are not trying to give specific standards against which institutions will be measured, but we are saying to them, "Look, if you make a statement about what it is you are going to do, then we expect you to have a method in place for evaluating that and determining how well you are in fact doing what it is you say you are doing." And then we are saying, "Not only is this an exercise you must go through every 10 years, but you must take that information year by year and program it into your planning process, because really, that is the ultimate aim of determining your effectiveness—planning, determining how you are going to use your resources, determining how you are going to change your curriculum, your faculty, improving your program; if you determine that your graduates on the GRE are not doing as well as the national average, asking the question, why, what do you need to

do, how do you need to change your curriculum to make those students more acceptable and at least help them come up to the national norm."

So this is the way we have outlined it. We have structured it in this way, and we feel like this is a very valid approach.

In summary, let me just read what I had in the statement here, and I think this pretty well synopsizes what it is I wanted to say.

We continue in our conviction that outcomes assessment must have its place in the legitimate concerns of the accrediting process. We are steadfast in our conviction that it is both reasonable and necessary to require that an accredited institution be able to describe what it is trying to achieve, how it measures the extent of that achievement, and that it is achieving its objectives to a reasonable degree.

What we have in the Southern Association is an opportunity for the College Commission, which I represent, and is member institutions to explore and learn together, for an accrediting agency and its constituent members to enhance the credibility and accountability of both. Our new criteria, and especially the section on "Institutional Effectiveness," is a very modest first step in this direction.

Thank you very much.

Senator STAFFORD. Thank you very much, Dr. Rogers.

[The prepared statement of Dr. Rogers follows:]

COMMENTS TO THE SENATE SUBCOMMITTEE ON EDUCATION
REGARDING THE NEW CRITERIA FOR ACCREDITATION
OF THE COMMISSION ON COLLEGES
OF THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

GIVEN BY JAMES T. ROGERS
EXECUTIVE DIRECTOR
COMMISSION ON COLLEGES

January 28, 1986

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE. I AM PLEASED TO HAVE THIS OPPORTUNITY OF BRIEFLY OUTLINING SOME OF THE MAJOR REVISIONS WHICH HAVE RECENTLY TAKEN PLACE IN THE STANDARDS FOR ACCREDITATION OF THE COMMISSION ON COLLEGES OF THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS. THESE REVISIONS WERE PRECIPITATED IN PART BY A GROWING CONCERN AMONG OUR MEMBERSHIP ABOUT EDUCATIONAL QUALITY AND THE NEED FOR GREATER INSTITUTIONAL ACCOUNTABILITY.

ONE OF THE MOST PERSISTENT CRITICISMS OF REGIONAL ACCREDITATION OVER THE YEARS HAS BEEN THAT IT RELIED TOO HEAVILY ON THE EVALUATION OF INPUT, PROCESSES, AND RESOURCES--AND NOT ENOUGH ON ASSESSMENT OF PRODUCTS, OR THE OUTCOMES OF THE EDUCATIONAL ENTERPRISE. ONE NEED ONLY LOOK AT THE STANDARDS USED BY OUR COMMISSION FROM 1958-1983, OR THOSE OF THE OTHER REGIONAL AGENCIES, TO SEE THAT THIS WAS A VALID OBSERVATION.

WITH THESE CONCERNS IN MIND, THE COMMISSION ON COLLEGES OF THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS BEGAN A COMPREHENSIVE REVIEW OF ITS STANDARDS IN 1980. THE RESULTANT REVISION, CALLED THE CRITERIA FOR ACCREDITATION, REFLECTS THE RESULTS OF A SURVEY OF OVER 1,700 PEOPLE, THE WORK OF CLOSE TO 200 PEOPLE SERVING ON EITHER A STEERING COMMITTEE OR SIX STUDY COMMITTEES, INPUT RECEIVED AS THE RESULT OF THREE MAIL-OUTS OF DRAFT MATERIALS TO THE TOTAL MEMBERSHIP, AND SIX STATE SEMINARS INVOLVING OVER 800 PARTICIPANTS. THE NEW CRITERIA WERE ADOPTED OVERWHELMINGLY BY THE MEMBERSHIP IN 1984 AND ARE IN EFFECT NOW.

IT WAS DETERMINED BY THE STEERING COMMITTEE AT THE OUTSET OF THE PROJECT, THAT "OUTCOMES ASSESSMENT" WAS TO BE A VITAL AND PERVASIVE THEME WHICH WOULD PERMEATE THE FINAL PRODUCT. HOWEVER, SEVERAL FACTORS BECAME VERY EVIDENT EARLY ON WHICH MITIGATED AGAINST THE AMBITIOUS PROJECT FIRST ENVISIONED. TO CITE JUST A FEW:

1. WE FOUND THAT SOME INSTITUTIONS DISAGREED WITH THE PHILOSOPHY OF OUTCOMES ASSESSMENT, STATING THAT OUTCOMES ASSESSMENT SUBJECTED INSTITUTIONS TO A REDUCTIONIST METHODOLOGY WHICH VIEWED STUDENTS AS PRODUCTS AND EDUCATION AS A FORM OF BEHAVIOR MODIFICATION TO BE EMPIRICALLY VERIFIED THROUGH EFFECTIVENESS INDICATORS AND MEASURABLE OUTCOMES. THEY OBJECTED TO THE COMPREHENSIVE REQUIREMENT THAT A UNIVERSITY'S HIGHEST AND MOST FUNDAMENTAL PURPOSES MUST BE REDUCED TO MEASURABLE AND ASSESSABLE OUTCOMES.

3

2 WE DISCOVERED THAT THE PHRASE "OUTCOMES ASSESSMENT" WAS CONSIDERED BY SOME AS NOTHING MORE THAN EDUCATIONAL JARGON AND, THUS, SUSPECT ON THE FACE OF IT;

3. WE DISCOVERED THAT THE NOTION OF OUTCOMES ASSESSMENT WAS VERY THREATENING TO MANY, PARTICULARLY FACULTY, WHO FELT THAT SUCH ASSESSMENT WOULD EXPOSE THEM TO THE WORLD, "WARTS AND ALL;"

4. WE DISCOVERED THAT OUTCOMES ASSESSMENT, AS A PROCESS, WAS NOT NEARLY AS WELL DEVELOPED AS WE HAD THOUGHT--THAT IS--EXPERIENCE IN ITS APPLICATION WAS FAIRLY LIMITED AND PROCEDURES AND INSTRUMENTS FOR ITS IMPLEMENTATION WERE NOT WIDELY AVAILABLE;

IT BECAME OBVIOUS THAT A HOST OF DIFFICULT ISSUES WOULD ATTEND ANY ATTEMPT TO DEAL WITH THE MEASUREMENT OF OUTCOMES IN THE ACCREDITING CONTEXT--THE MOST PROMINENT OF WHICH WOULD BE THE DIFFICULTY OF VERIFYING A PRESUMED "CAUSE AND EFFECT" RELATIONSHIP. DO THE INPUTS AND PROCESSES WE PRESCRIBE, NECESSARILY, OR EVEN PROBABLY, LEAD TO QUALITY LEARNING? HOW DOES ONE ACTUALLY DETERMINE THAT THERE HAS BEEN "VALUE-ADDED" BY THE INSTITUTION?--DID THE INSTITUTION MAKE ANY DIFFERENCE? THE ISSUE IS FURTHER CONFOUNDED BY THE FACT THAT THE STUDENT IS NOT SIMPLY THE CONSUMER AND THE PRODUCT OF THE PROCESS--THE STUDENT IS CO-PRODUCER OF THE PRODUCT AS WELL. THE INSTITUTION DOES NOT SUCCEED OR FAIL BY ITSELF.

4

HOWEVER NOTWITHSTANDING THE COMPLICATIONS OF "CAUSE AND EFFECT," "VALUE-ADDED," OR "QUALITY OF STUDENT EFFORT," THE STEERING COMMITTEE, THE EXECUTIVE COUNCIL, AND THE STAFF OF THE SACS COLLEGE COMMISSION, ARRIVED AT A CONSENSUS AND A CONVICTION IN 1979 THAT THE QUESTION OF OUTCOMES ASSESSMENT MUST RECEIVE SIGNIFICANTLY INCREASED ATTENTION BY MEMBER INSTITUTIONS AND BY THE ACCREDITING PROCESS. IT WAS FELT THAT VIRTUALLY ANY INTERPRETATION OF ACCOUNTABILITY--BY OUR CLIENTS, BY OUR PUBLICS, BY OURSELVES--DEMANDED IT.

FURTHER, IT WAS CLEAR THAT "STAND-ALONE" OUTCOMES ASSESSMENT WAS NEITHER VERY MEANINGFUL NOR VERY USEFUL. IT WAS FELT THAT THERE MUST BE A MECHANISM WHICH RELATES THE RESULTS OF OUTCOMES ASSESSMENT TO THE DAY-TO-DAY OPERATION OF THE INSTITUTION AND ITS DECISION-MAKING PROCESSES. THE VEHICLE FINALLY CHOSEN WAS THE PLANNING PROCESS. OUTCOMES ASSESSMENT, BY WHATEVER NAME, IS AN ESSENTIAL PART OF THE PLANNING PROCESS (THE EVALUATION PHASE) AND IT COULD BE VIEWED AS CLOSING THE PLANNING PROCESS LOOP.

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ONE MIGHT THINK THAT THESE ARE ALL NOBLE SENTIMENTS AND WORTHY OBJECTIVES, AND, AT LEAST IN PRINCIPLE, ARE LIKELY TO BE ENDORSED BY ANY "RIGHT THINKING" EDUCATOR. AND, SURELY, WITH THE FEW COMMERCIALLY DEVELOPED ASSESSMENT PROGRAMS THAT ARE AVAILABLE FROM ACT-COMP, ETS, NCHEMS, AND THE LIKE, AND WITH SOME HOMEGROWN INSTRUMENTS AND PROGRAMS, WE COULD MAKE A BEGINNING. WELL--PERHAPS. WE SENSED ALL ALONG A NERVOUSNESS AND A RELUCTANCE TO BUY INTO A CONCEPT THAT WAS SUBSTANTIALLY LESS THAN FULLY DEVELOPED AND FOR WHICH THE COMMISSION WAS NOT PREPARED TO DESCRIBE VERY SPECIFICALLY WHAT WERE TO BE ITS EXPECTATIONS. WITH THEIR ACCREDITATION RIDING ON THE OUTCOME, MANY INSTITUTIONS SAW THIS AS BUYING A "PIG-IN-A-POKE."

HOWEVER, THE COMMISSION PERSISTED AND A SUBSTANTIAL NUMBER OF OUR MEMBER INSTITUTIONS HAVE COME TO VIEW THE NEW ATTENTION TO "INSTITUTIONAL EFFECTIVENESS," AS AN OPPORTUNITY TO BE ABLE TO RESPOND IN A FORTHRIGHT AND AGGRESSIVE MANNER TO THE CHALLENGES OF THE SOUTHERN CONFERENCE OF GOVERNORS, TO THE REPORT OF BUSINESS-HIGHER EDUCATION FORUM, TO THE SOUTHERN REGIONAL EDUCATION BOARD, AND TO OTHER RECENT CRITICS. FURTHER, IT IS AN OPPORTUNITY FOR THE COLLEGES THEMSELVES TO DEVELOP FOR THEMSELVES, THROUGH THE MECHANISM OF ACCREDITATION, A VIABLE INSTITUTIONAL EVALUATION AND PLANNING PROCESS, BEFORE OUTSIDE AGENCIES IMPOSE THE SAME UPON THEM.

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THERE MAY BE A FINE LINE BETWEEN BEING OVERLY PRESCRIPTIVE AND FAILING TO MAKE ONES EXPECTATIONS CLEAR. WE ELECTED TO ERR ON THE SIDE OF GENERALITY AND NON-PRESCRIPTIVENESS. IN OUR NEW CRITERIA, THE COMMISSION IMPOSES NO PERFORMANCE STANDARDS, NOR DOES THE COMMISSION MANDATE ANY PARTICULAR EVALUATION OR PLANNING PROCESS. IN FACT, ALTHOUGH THE FOCUS OF CONCERN IS ON THE RESULTS OF EDUCATION, THE COMMISSION IS STILL EVALUATING PROCESS--THE INSTITUTION'S PROCESS FOR ASSESSING RESULTS. BUT NOW A COMPREHENSIVE APPROACH TO ACCREDITATION TAKES INTO ACCOUNT THREE ELEMENTS:

A. RESOURCES/INPUTS;

B. PROCESS; AND

C. EVALUATION OF THE RESULTS OF EDUCATION AND PLANS FOR THE IMPROVEMENT OF THE INSTITUTION'S PROGRAMS AND PROCESSES.

CONSISTENT WITH THE ABOVE PREMISES, THE NEW SECTION ON INSTITUTIONAL EFFECTIVENESS CONTAINS FIVE CRITERIA UNDER AN UMBRELLA STATEMENT WHICH DECLARES THAT, "INSTITUTIONS HAVE AN OBLIGATION TO ALL CONSTITUENTS TO EVALUATE EFFECTIVENESS AND TO USE THE RESULTS IN A BROAD-BASED, CONTINUOUS PLANNING AND EVALUATION PROCESS."

THE FIVE CRITERIA OR "MUST" STATEMENTS ARE:

1. INSTITUTIONS MUST ESTABLISH ADEQUATE PROCEDURES FOR PLANNING AND EVALUATION;
2. INSTITUTIONS MUST DEFINE THEIR EXPECTED EDUCATIONAL RESULTS AND DESCRIBE HOW THE ACHIEVEMENT OF THESE RESULTS WILL BE ASCERTAINED;
3. INSTITUTIONS WITH RESEARCH AND PUBLIC SERVICE MISSIONS MUST DEVELOP AND IMPLEMENT APPROPRIATE PROCEDURES FOR EVALUATING THEIR EFFECTIVENESS IN THESE AREAS;
4. INSTITUTIONS MUST ENGAGE IN CONTINUING STUDY, ANALYSIS AND APPRAISAL OF THEIR PURPOSES, POLICIES, PROCEDURES AND PROGRAMS; AND,
5. INSTITUTIONS MUST REGULARLY EVALUATE THE INSTITUTIONAL RESEARCH FUNCTION.

WHAT PURPOSE DOES THE NEW SECTION ON INSTITUTIONAL EFFECTIVENESS SERVE? WHAT IMPACT WILL CONTINUOUS PLANNING AND EVALUATION HAVE ON THE INSTITUTION AND ON THE ACCREDITATION PROCESS?

THE NEW FOCUS ON INSTITUTIONAL EFFECTIVENESS DOES THE FOLLOWING:

1. EMPHASIZES THE NEED FOR POSTSECONDARY INSTITUTIONS TO DEVELOP A PROCESS FOR ON-GOING SELF-EVALUATION.

2 ENCOURAGES INSTITUTIONS TO CONTINUE THE MOMENTUM THAT RESULTS FROM THE SELF-STUDY PROCESS. FOR THE MOST PART, THE SELF-STUDY PROCESS HAS BEEN AN ISOLATED EVENT ON THE CONTINUUM OF INSTITUTIONAL ACTIVITIES--USUALLY OCCURRING ONLY EVERY TEN YEARS. THE CRITERIA STATES THAT INSTITUTIONS HAVE AN OBLIGATION TO EVALUATE EFFECTIVENESS AND USE THE RESULTS IN A CONTINUOUS PLANNING AND EVALUATION PROCESS.

3. ENCOURAGES INSTITUTIONAL LEADERS TO USE ONGOING PLANNING AS A BASIS FOR ALL MAJOR ADMINISTRATIVE AND DECISION MAKING ACTIVITIES OF THE INSTITUTION.

4. SERVES AS A GUIDE FOR A MORE INTEGRATED PLANNING PROCESS. IN MANY INSTITUTIONS, PLANNING IS FRAGMENTED AND REACTIVE. PROGRAM AND SERVICE UNITS ARE FREQUENTLY ISOLATED FROM THE INSTITUTIONAL CENTER OF POWER AND HAVE A LIMITED PERSPECTIVE OF CAMPUS-WIDE ISSUES. CONSEQUENTLY, PLANNING AND EVALUATION WHICH OCCURS AT THE UNIT OR PROGRAM LEVEL, IS OFTEN HANDICAPPED FROM THE OUTSET BECAUSE THE UNIT NARROWLY DEFINES ITS OWN GOALS WITHOUT THE BENEFIT OF BEING ABLE TO ENHANCE INSTITUTIONAL GOALS. A MORE INTEGRATED PLANNING PROGRAM WILL CHANGE SUCH PRACTICES.

5. ENCOURAGES INSTITUTIONS TO INTEGRATE EVALUATION AND PLANNING INTO ONE CYCLE--A CYCLE THAT IS ONGOING AND BY NECESSITY, USES A COMMON, REGULARLY UPGRADED, DATA BASE. THE CYCLE NEEDS ACCESSIBLE AND RELIABLE DATA--UNIFORM DATA AND DEFINITIONS WHICH PROVIDE STANDARDIZED INFORMATION TO MAKE MANAGEMENT FUNCTION MORE EFFECTIVELY.

6. PROVIDES OUR ACCREDITING ASSOCIATION THE MECHANISM TO EVALUATE ALL TYPES OF LEARNING. FOR EXAMPLE, IT HAS ALWAYS BEEN DIFFICULT FOR A VISITING COMMITTEE TO EVALUATE AN INSTITUTION WHICH EMPLOYED THE USE OF TELECOMMUNICATIONS SYSTEMS TO REACH POTENTIAL LEARNERS. WHAT INPUTS, RESOURCES AND PROCESSES COULD THEY EXAMINE? VISITING COMMITTEES WILL NOW BE ABLE TO EXAMINE THE RESULTS OF SUCH EDUCATIONAL PROCESSES AND THE ACHIEVEMENT OF GOALS.

WE CONTINUE IN OUR CONVICTION THAT OUTCOMES ASSESSMENT MUST HAVE ITS PLACE IN THE LEGITIMATE CONCERNS OF THE ACCREDITING PROCESS. WE ARE STEADFAST IN OUR CONVICTION THAT IT IS BOTH REASONABLE AND NECESSARY TO REQUIRE THAT AN ACCREDITED INSTITUTION BE ABLE TO DESCRIBE WHAT IT IS TRYING TO ACHIEVE, HOW IT MEASURES THE EXTENT OF THAT ACHIEVEMENT, AND THAT IT IS ACHIEVING ITS OBJECTIVES TO A REASONABLE DEGREE.

10

WHAT WE HAVE IN THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS IS AN OPPORTUNITY FOR THE COLLEGE COMMISSION AND ITS MEMBER INSTITUTIONS TO EXPLORE AND LEARN TOGETHER--FOR AN ACCREDITING AGENCY AND ITS CONSTITUENT MEMBERS TO ENHANCE THE CREDIBILITY AND ACCOUNTABILITY OF BOTH. OUR NEW CRITERIA, AND ESPECIALLY THE SECTION ON "INSTITUTIONAL EFFECTIVENESS," IS A VERY MODEST, FIRST STEP IN THIS DIRECTION.

Senator STAFFORD. Mr. Sweeney, we would be glad to hear from you. First, however, we will place in the record some comments from Senator Hatch addressed to you.

Senator STAFFORD. Mr. Sweeney, you may proceed.

[The material referred to follows:]

COMMENTS OF SENATOR HATCH TO MR. SWEENEY

Senator HATCH. Mr. Sweeney, I regret that the same previous commitment which prevented me from hearing Secretary Bennett's testimony this morning will also prevent me from attending to hear your testimony. I do, however, wish to welcome you today and assure you that I look forward to reading your testimony.

The State Approving Agencies, whom you represent as President of the National Association of State Approving Agencies, have an important perspective from which to advise us on what should be the relationship between the states and the Federal Government in measuring quality in higher education programs. I know this issue is of great concern to the educators in my home state of Utah. Thus, I am most grateful for your appearance here today.

Mr. SWEENEY. Mr. Chairman and members of the committee, it is my privilege and pleasure to have this opportunity to appear before you today.

Thank you for the opportunity to comment on a subject that is of concern to all Americans, especially those involved in the education profession and those of us whose sons and daughters either have been, are or will be, pursuing a program of higher education.

My name is Don Sweeney, and I am president of the National Association on of State approving agencies. Please let me take a moment to structure the context within which I offer remarks this morning.

First, the topic I address is focused at the postsecondary institutional program level from the perspective of State approving agencies.

State approving agencies are charged with the responsibility to evaluate, approve or disapprove, and monitor programs of education offered to military personnel, veterans and their dependents. The National Association of State Approving Agencies is made up of State approving agencies from the 50 States, the District of Columbia, and the Commonwealth of Puerto Rico. The legal basis of SAA responsibility and activity is found in title 38, United States Code.

Second, quality assessment is an all-encompassing phrase. To assess quality, we might focus our attention on the institution's mission and goals, organization and governance, program objectives, instruction and graduation requirements, physical facilities to include laboratories and library, student services, financial resources, faculty, and academic policies to include student progress.

These are broad categories but ones that I think help us to focus our attention.

Third, there are several processes in place, and we have discussed those this morning, that help to assess and insure quality as defined in the previous paragraph. This committee is certainly aware of the national accrediting associations, the regional accrediting associations, and specialized program accrediting associations.

In addition, at the State level, there are requirements leading to the authorization to award degrees, licensing requirements for pro-

prietary institutions, and requirements for approval of programs for educational assistance under the various GI bills.

My purpose this morning is threefold: to address the dimension of quality assessment known as academic progress standards; to describe an existing mechanism that is an integral part of quality assessment, and to provide—and I think here is the important one—to provide the suggestion for further utilization of this mechanism in our efforts to assess quality and accountability in postsecondary educational systems.

Academic progress standards have entered the limelight in recent years because of concern for proper usage of funds awarded from the various student assistance programs in the Higher Education Act. The standards are those by which an individual is judged as either progressing satisfactorily or not toward their educational objective.

Progress standards are usually defined as having two components: quality and quantity. The quality component consists of the standards and the system for determining how well a student is progressing. Many institutions require the maintenance of a certain numerical grade point avarage. The minimum acceptable GPA generally increases as one moves toward their educational objective. The quantity component is the rate or pace at which a student must progress.

In October 1983, the Department of Education published regulations which set parameters for academic progress standards for student aid eligibility under the Higher Education Act. These regulations were a result of reports indicating the failure of postsecondary institutions to effectively establish and enforce satisfactory standards.

Since publication of these regulations, questions of effectiveness continue to surface about them. Part of the current concern centers around an effective monitoring system.

Earlier, I described the basic organization and responsibility of State approving agencies. Let me take a moment to elaborate.

In many States, SAA's are organizationally located within units that have responsibility for administering student aid under the Higher Education Act.

Some SAA personnel also have responsibility for evaluations that may lead to degree-granting authority or State licensing. As you might expect, almost all postsecondary institutions in each State have at least some of their programs approved for veterans' education purposes. Thus, SAA personnel have an established rapport with officials of institutions within the borders of their respective States. Information on programs institutional policies and procedures as well as student records are accessible to SAA personnel.

The State approving agency process is program-oriented. It encompasses a review of program objectives, curriculum, admission requirements, institutional policies such as those for evaluating previous education or training—that is to say, transfer credit—and satisfactory academic progress. Once approved, programs and policies are reevaluated annually.

In addition, because of direct affiliation with a Federal agency, the Veterans Administration, there is a high degree of consistency and continuity in the establishment and enforcement of standards

applicable to students receiving veterans' educational assistance. SAA's help institutions and students to be accountable.

Earlier, I stated my third purpose was to provide the suggestion for further utilization of State approving agencies in our efforts to assess quality and accountability in our postsecondary educational systems. State approving agencies are an option for ensuring institutional implementation and enforcement of quality academic progress standards. Sections 1771(a), 1773, 1774 (a) and (c), and 1982 of title 38, United States Code, provide a guide for the development of this option.

State approving agencies are established. They are familiar with student needs and the evaluation of institutional policies and procedures. Involvement of existing SAA expertise would be an efficient, economical way to ensure proper expenditure of higher education student assistance funds. Involvement of SAA's would also fill a void in the assessment of quality in our postsecondary education systems.

Mr. Chairman, I would be most happy to respond to questions. Again, thank you for this opportunity.

Senator STAFFORD. Thank you very much, Mr. Sweeney.

[The prepared statement of Mr. Sweeney follows:]

TESTIMONY BEFORE

SENATE SUBCOMMITTEE ON
EDUCATION, ARTS AND THE HUMANITIES

ON
QUALITY ASSESSMENT -
ACADEMIC PROGRESS-STANDARDS

PRESENTED BY
C. DONALD SWEENEY
PRESIDENT, NATIONAL ASSOCIATION
OF STATE APPROVING AGENCIES

JANUARY 28, 1986

Mr. Chairman and members of the committee, it is my privilege and pleasure to have this opportunity to appear before you today. Thank you for the opportunity to comment on a subject that is of concern to all Americans, especially those involved in the education profession and those of us whose sons and daughters either have been, are or will be pursuing a program of higher education. My name is Don Sweeney and I am President of the National Association of State Approving Agencies.

Please let me take a moment to structure the context within which I offer remarks this morning. First, the topic I address is focused at the postsecondary institutional program level from the perspective of State approving agencies. State approving agencies (SAA) are charged with the responsibility to evaluate, approve or disapprove, and monitor programs of education offered to military personnel, veterans and their dependents under the provisions of the various Veterans Educational Assistance programs, more commonly known as G.I. Bills. The National Association of State Approving Agencies is made of SAAs from the 50 states, the District of Columbia and the Commonwealth of Puerto Rico. The legal basis of SAA responsibility and activity is found in Title 38, U.S. Code.

Second, quality assessment is an all encompassing phrase. To assess quality, we might focus our attention on the institution's:

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physical facilities to include laboratories and library;

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These are broad categories but ones that help us to focus attention.

Third, there are several processes in place to help assess and insure quality as defined in the previous paragraph. This committee is already aware of the voluntary accreditation process in our country. There are national accrediting associations, regional accrediting associations, and specialized program accrediting associations. In addition, at the State level there are requirements leading to the authorization to award degrees, licensing requirements for proprietary institutions, and requirements for approval of programs for educational assistance under the various G.I. Bills.

My purpose this morning is threefold:

(1) to address the dimension of quality assessment known as academic progress standards;

(2) to describe an existing mechanism that is an integral part of quality assessment; and,

(3) to provide the suggestion for further utilization of this mechanism in our efforts to assess quality and accountability in our postsecondary educational systems;

Academic progress standards have entered the limelight in recent years because of concern for proper usage of funds awarded from the various student assistance programs in the Higher Education Act. The standards are those by which an individual is judged as one either progressing satisfactorily or not towards their educational objective.

Progress standards are usually defined as having two components: quality and quantity. The quality component consists of the standards and the system for determining how well a student is progressing. Many institutions require the maintenance of a certain (numerical) grade point average (GPA). The minimum acceptable GPA generally increases as one moves toward their objective. The quantity component is the rate or pace at which a student must progress.

In October of 1983, the Department of Education published regulations which set parameters for academic progress standards for student aid eligibility under the Higher Education Act. These regulations were a result of reports indicating the failure of postsecondary institutions to effectively establish and enforce satisfactory standards. Since publication of these regulations questions of effectiveness continue to surface about them. Part of the current concern centers around an effective monitoring system.

Earlier, I described the basic organization and responsibility of State approving agencies. Let me take a moment to elaborate.

In many states, SAAs are organizationally located within units that have responsibility for administering student aid under the Higher Education Act. Some SAA personnel also have responsibility for evaluations that may lead to degree granting authority or state licensing. As you might expect, almost all postsecondary institutions in each state have at least some of their programs approved for veterans education purposes. Thus, SAA personnel have an established rapport with officials of institutions within the borders of their state. Information on programs, institutional policies and procedures as well a student records are accessible to SAA personnel.

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In addition, because of direct affiliation with a federal agency (VA) there is a high degree of consistency and continuity in the establishment and enforcement of standards applicable to students receiving veterans educational assistance. SAAs help institutions and students to be accountable.

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Mr. Chairman and members of the Committee, I would be happy to respond to questions. Again, thank you for this opportunity.

Senator STAFFORD. Before I ask one or two questions, let me without objection reserve to other members who cannot be here this morning the right to submit questions in writing, gentlemen, if that would be agreeable, and if they wish to do so; if you could respond at your early convenience, we will then incorporate them in the record. We are competing with several other committees this morning, including the Committee on Foreign Relations, of which Senator Pell is the ranking member, which is why he was forced to leave. The committee's budget is being discussed by the Rules Committee, I believe, and you can understand his concern about that.

Mr. Sweeney, for my better understanding of your organization, you have SAAs in all 50 States, I think you testified.

Mr. SWEENEY. That is correct, Senator.

Senator STAFFORD. Using the Secretary of Education's alma mater as an example, Williams College in Massachusetts, would that college be evaluated for accreditation by your agency in Massachusetts?

Mr. SWEENEY. Yes, it would, Senator. I would like to take a moment to qualify the question. There is a distinguishable difference between what we normally perceive as the accreditation process and the process that is employed by State approving agencies. As I stated a bit earlier, it is program oriented and as such gets right down to the day to day operations of an institution as opposed to the broader conceptual, philosophical areas such as mission and goals, governance, and the like.

But yes, I am sure the college has approval for at least a large majority if not all of their programs. I could suppiy you with exact information later.

Senator STAFFORD. Since we are such a big country and so wide, both geographically, and large in terms of population, would the same standards for accreditation by the SAA in California be applied against Whittier College, for example, as might be applied in Massachusetts in evaluating Williams College?

Mr. SWEENEY. I can surely say, Senator, that the majority of the criteria would be identical. I can say that primarily because the laws and regulations establishing the criteria are ones that have evolved out of the Federal Government over the last 40 years.

Senator STAFFORD. All right. Dr. Rogers, have the new assessment measures made it more difficult for schools to be accredited by your association in the southern colleges?

Dr. ROGERS. Well, the final draft of the criteria was approved at this year's annual meeting in December, so it is now fully in effect, and any institution accredited from this point on will be accredited according to the new criteria. We have a number of institutional presidents who are very apprehensive about the criteria and the requirement of the institutional effectiveness section, as you may imagine. It is a whole new approach. It is asking questions that have never been asked before. It is asking them to substantiate what it is they are doing in a way that has never been asked before. But when we explain it to them, and we explain that we are being very nonprescriptive, we are asking them to simply do what they should have been doing all along, we are finding that they are very responsive to that, and I think we are going to see some real exciting developments in this whole area of assessment.

Senator STAFFORD. Does your organization have regular contact with the U.S. Department of Education on this issue of accreditation?

Dr. ROGERS. Oh, yes, sir. We were just reaffirmed, I guess is the correct term. Every 5 years, we have to go through reaffirmation of our own accrediting processes with not only the U.S. Office of Education, but also COPA, and we did go through that process this year. We were scheduled to come and appear before a committee, and the committee, I think, was short on members or whatever. That final determination has not been made yet, but we did go through that this year, yes.

Senator STAFFORD. Let me ask sort of a three-barrelled question here, if I may, with respect to the Southern Association of Colleges and Schools. First of all, has your organization turned down any schools within the group in the past for failure of meeting standards for accreditation and second, if that has occurred, or even if it has not, hypothetically, is there some other organization a school that has been rejected for accreditation could turn to to be accredited at least by a secondary accrediting group?

Dr. ROGERS. Well, in answer to your first question, yes, we have turned down a number of institutions for initial accreditation. There is a process they go through. They have to be a candidate first. And until they have met the requirements for candidacy, they cannot even move into the next phase. So we have turned down a number of institutions for candidacy.

At our annual meeting this year where we have our committees to review the reports, these 10-year reaffirmation reports, we placed eight or nine institutions on notice—that is a private sort of thing, but it means that they are marginally acceptable, and they have 1 year to correct that deficiency. We placed about 9 or 10 institutions on notice. We placed two or three on public probation, and one other institution has been given its last opportunity; it has been placed on extraordinary status, and with the clear understanding that if they do not get their house in order this year, they will be removed from membership next year.

So, we are tightening up. I think our committees sense the mood of the country. We want to be in a position where we can be proud of what we are doing, that our membership can be proud of the fact that they are members of an accrediting association that is expecting certain things of them in terms of quality.

In answer to your second question, where can they turn, there are other accrediting groups—I am not as familiar with their standards as I am with our own—but there are other accrediting groups, specialized accrediting groups, and very often, they are I guess approached by these institutions that are turned down. What response they get from them, I do not know, really. You would have to ask someone from that element.

Senator STAFFORD. Thank you very much. I am encouraged by what you have both said and by the Secretary's testimony this morning on looking at the product. It seems to me that sort of an analagous situation would be for an automobile manufacturer to produce a product that has an engine and four wheels and a body and brakes and so on, but does not check to see whether it will run or not. I think that maybe assessing the success of a college or a

university in producing students by the capabilities of those graduates is a healthy way to go, and I am glad that we are beginning to go that way.

Dr. ROGERS. May I just add one last comment?

Senator STAFFORD. Yes, indeed.

Dr. ROGERS. I think the concept of outcomes assessment is very new; the instruments we are using, the testing instruments, are not as well-defined as we would like. I think you and others, the general public, need to understand that the system is not a perfect system. I think there is no way that one can measure another individual and determine the growth.

Now, there are a lot of factors that take place in success in college, a lot of intangibles that a student is exposed to, a lot of the students' own initiative that comes into play. So to be able to say the institution is responsible for all the progress would really be a mistake. But I think this is a move in the right direction, and rather than throwing it all out, we are saying we are going to develop something, and we are going to use what we can of that, because we think it is a valid approach.

Senator STAFFORD. Thank you, Dr. Rogers.

I guess we who work in the U.S. Congress, and I have been here 25 years now, understand that no institution is a perfect one.

We are very glad that Senator Dodd, who is a valuable member of this committee, has had a chance to come in. Senator, if you have any opening statement, you can either deliver it or put it in the record, and if you have any questions, the witnesses are available.

Senator DODD. As always, you are very gracious, Mr. Chairman. I would just ask unanimous consent that any opening statement I would have be incorporated in the record, and I apologize to you and the witnesses. As so often happens around here, I think there is a conspiracy of chairmen sometimes. Invariably, either I have a day when none of my committees meet, or they all meet at exactly the same time, and that happens to be the case this morning.

If I can, Mr. Chairman, I had some questions for Secretary Bennett and regret I did not get a chance to ask those.

Senator STAFFORD. I reserved the right for members to submit questions in writing, Senator.

Senator DODD. I appreciate that.

If I can raise two questions very quickly—and you have been very patient to wait here this morning. The financing of accreditation associations—the book, "Education on Trial: Strategies for the Future," raised the question that under the present framework, we have the very institutions that are being evaluated for accreditation paying fees to the associations that do the evaluation. Obviously, on its face, there would appear to be a problem there in terms of the kind of assessment. I am not suggesting anyone is falling prey to it, but certainly, if you are collecting fees for institutions that are also being accredited by the very association that depends upon its financial resources from the institution to be accredited, you have got at least on its face a potential conflict there.

In his book, the author mentions two sources of shifting the financial burden—one, to the States, or others, to independent foundations. I wonder if either of you—we could begin with you, Dr.

Rogers—would have any comments about the financing of these accreditation associations.

Dr. ROGERS. I am familiar with his position, and I disagree with it.

First of all, the fees or the dues are not out of line with what institutions can pay. If they were inordinately high, I would say there may be some validity in what he is saying—but they are not.

The second thing is that most of the institutions are absolutely delighted to be a part of an accrediting group. It is a statement of acceptability and quality, and any institution worth its salt, and the presidents and deans of those institutions are the ones who really control our association—they are proud of that fact, and they do not mind supporting the efforts of the association.

We have just gone through a dues increase, the first one in five years, a 20 percent dues increase. It was not accepted by the membership unanimously, but almost 97 percent of the membership voted in favor of that.

So I do not see that as any sort of cloud hanging over accreditation that brings into question the validity of what we are doing, I really do not.

Senator DODD. I think it is terrific that the institutions support and finance and help. My point is, I suppose, that you know this is competition. We are talking about proprietary institutions in a lot of States, and it is a competitive market today with growing tuitions and so fourth. Obviously, the possibility in any part of the country of an institution getting under way that could detract from another institution or other institutions' ability to attract students is a competitive problem. I am not talking in all cases about theoretical discussions here; it is becoming more and more and more competitive.

If, in fact, the associations that do the accrediting depend upon the financial support of the institutions to be accredited, it seems to me, then, there is a potential conflict there, and maybe we ought to be looking at other sources of funding to support the associations, without any suggestion whatsoever that that is a particular problem at this juncture, but I can see it becoming a problem—particularly with the growing number of trade schools, technical schools, and community colleges that are going to have difficulty necessarily building the kinds of resource assessment libraries and whatnot, even though they may be in a city where there is a hell of a public library.

I think Secretary Bennett raised some very excellent points that student outcome, rather than resource availability—not that you exclude resource availability—but student outcome ought to be—the weightier part of that test ought to be on that particular side. I can see the situation arising where, as I say, institutions that have been around a few years, have built up and have resource capacity, they see someone else coming along who is going to cut into that market, they are helping finance the association that determines whether or not another school ought to be accredited—I think you have got a problem, a potential problem.

Am I exaggerating the case?

Dr. ROGERS. Well, I do not want to downplay what you are saying, but I do not personally see it as a major problem. The dues

are based on a graduated scale, depending upon the size of the institution; the larger the institution, the more they pay up to a certain point. The smaller the institution, the less they pay. And it is to the advantage of the smaller institution to be an accredited member. And most of them are more than willing—they view that as part of what is required to be accepted in the academic community. And we have not heard a great outcry from any of those about the dues.

Senator DODD. Oh, no, I would assume quite the opposite. I would like to be able to pay; that potential influence is not a bad piece of the action to have. My point is not that the schools are complaining about it, but looking from an accreditation standpoint, whether or not it makes good sense for us to be depending upon that source of funding. That is my point.

Dr. ROGERS. And certainly, there is some validity in what you are saying. I think when you look at the alternatives of funding—State funding, national funding, foundation funding—I do not see a tremendous availability of funds in any of those areas. Every foundation, as you know, is deluged with requests. The Federal Government is not capable of handling any additional funding, and States certainly are not.

So it is an interesting theoretical question. At this particular juncture, I do not see it as a major problem, nor do I see that as a solution to a potential problem, really.

Senator DODD. Mr. Sweeney, do you want to comment on that?

Mr. SWEENEY. I would not comment directly on that issue, Senator, but I would certainly go back to remarks I made earlier, and they were with respect to State involvement. I believe the process I described is complementary in nature to the accreditation process, and one which could fill a considerable void. I believe that a part of what we are talking about, then, is neutral in nature and unexplored territory. I know we could debate—and certainly, I would not even want to begin to do that here, with Dr. Rogers—debate this whole issue of whether or not there is a conflict of interest, because I think the debate could go on for a considerable length of time. But certainly it is an issue, and the fact that it is one raises the question, then, of what alternatives can be more neutral or objective. I believe in the State process. True, in my remarks, I was advocating the involvement of groups of people who I happen to work with—but the underlying principle, the real issue that I was getting at, was the whole business of State involvement; States rights, the States responsibility to educate their citizens, and then to monitor and have some involvement in assuring educational program quality and credibility.

So I would comment to that extent, sir.

Senator DODD. I appreciate that.

Last, in Secretary Bennett's testimony this morning on page 14—and I will quote him here, "Consequently, I will ask the National Advisory Committee on Accreditation and Institutional Eligibility to conduct a review of the current criteria for recognizing national accrediting agencies and associations, and also to examine the Federal process," and so forth.

I am wondering—which I applaud, by the way; I think that is a good thing to do—but if both of you were just hired by Secretary

Bennett here this morning, what would you advise him? What changes in the recognition criteria would you recommend to him or to the National Advisory Committee?

Dr. ROGERS. Unfortunately, I have only been in my job for 6 months, and that is a part of my job that I am not that familiar with. I think it is fine to review the criteria he is using, and we would applaud that. We have just gone through that reaffirmation, I think I mentioned before you came in. With our new criteria, we think we are in very good shape. We can defend everything we are doing. We are in a very defensible position that would not cause any problems as far as my association is concerned, at all.

As far as the specific questions that he might ask, I think—and you will find that many of the associations are moving in the direction of outcomes assessment. The Middle States already has a statement; North Central, I think, has something; the Western Association is working on it. And I think certainly, they might want to revamp the requirements to recommend that they have something in the outcomes assessment area—"Institutional Effectiveness" is what we call it. But the outcomes assessment area, I think, is a critical part of the new approach.

In fact, I was with the executive directors last week, and we were discussing what we are doing in the Southern Association, and one of them from New England said, "It is the wave of the future, and we are all going to have to start doing that." They recognize that. But I think having something come from the Office of Education would help to encourage their memberships to move ahead on that, perhaps more quickly than they might otherwise.

Senator DODD. Mr. Sweeney.

Mr. SWEENEY. The suggestion that I would make is for the Commission to consider timeframes within which the accreditation process occurs. Especially if we are going to talk about accreditation as a system that literally involves itself up and down the line in education to include determining proper utilization of the financial assistance programs under the Higher Education Act, then we need to reconsider the appropriateness of the timeframes within which reviews take place. As you well know, we have certain accrediting agencies within the country that take a look at broad-based issues every 3 years, every 5 years, or depending upon the circumstances, every 7 to 10 years. There is a lot that happens at institutions between these reviews, and I do believe that this is critical enough to at least be posed in the way of a question. If we are going to utilize the current process, to assure quality and integrity in the usage of Higher Education funds, and if we are going to consider the review process as one needing to remain within the domain of the private sector, then are the timeframes adequate?

Senator DODD. And am I to understand that by your posing the question, you do not believe they are?

Mr. SWEENEY. I have some concern about that, yes, I do.

Senator DODD. Too long a period of time?

Mr. SWEENEY. Yes. And I think the scope of the activity, certainly, at those intervals, is very difficult to narrow.

Senator DODD. But couldn't there be a sliding scale of some kind or other, too? I presume that after a while, institutions having demonstrated over a number of years, whatever specific criteria we

have, and having met those standards, that rather than going back all the time to that same institution, having established a record—classes, if you will, class A, class B, class C institution, based on the period of time and the consistency there, whether it is student outcome and so forth—not to suggest that because they have been successful over one period of time that they are going to be indefinitely successful—but it seems to me you could put your attention onto those institutions that you may have more questions about, and shorten up that timeframe.

Dr. ROGERS. The traditional timeframe is about 10 years for most of the associations. And the self-study process if a very exhaustive sort of thing, if done properly, and takes about a year and a half to do.

What we are beginning to do in the Southern Association is we are revamping our whole data collection process, and we are going to begin asking for the essential data from every institution every year. And we are going to program that into a computer program that will evaluate that and help us identify institutions that are falling outside of the acceptable parameters so that we can get on top of that immediately with the idea of not penalizing the institution, but helping the institution. Many of them do not even realize that they are beginning to get into trouble until it is too late. So this is a way of sort of monitoring their progress on a yearly basis without requiring an exhaustive self-study. Then we do require more detailed, 5-year reports, which we review, and our committees accept or reject, so there are some checks and balances or times along there when we do have an opportunity to call an institution in, and as a result of the new program, if we identify a problem, we can ask that institution to send us a copy of their audit, and if we determine that their audit is not the way it ought to be, and if they are in debt too much, or their debt-asset ratio is out of proportion, we can call them in and ask them to do something about it, give them a year to collect it, and if they do not, then we can place them on notice or whatever.

So we have not been doing that in the past to the extent that we plan to do in the future.

Senator DODD. I think that is highly commendable and an excellent suggestion, as well.

Mr. Chairman, I thank you, and again, my apologies to you and the other witnesses for being tardy.

Senator STAFFORD. Thank you very much, Senator Dodd, and gentlemen, my appreciation personally and for the committee to you for the time and trouble that you have gone to to be here and for the assistance you have been to us on our deliberations on the accreditation of our colleges and universities.

Thank you very much for being here.

Mr. SWEENEY. Thank you.

Dr. ROGERS. Thank you, Senator.

[Additional material supplied for the record follows:]

MEMPHIS STATE UNIVERSITY
MEMPHIS, TENNESSEE 38152

*Office Administration Department*

February 11, 1986

Honorable Robert Stafford
United States Senate
Washington, DC 20510

Dear Senator

CSPAN aired a program the end of January on which you were stating your involvement on a committee to evaluate the quality of education. Although I saw only the ending moments of this program, I gathered that this committee will research the evaluation of colleges and universities by the various rating organizations. I support your efforts and indeed encourage you.

For the past 21 years I have taught at Memphis State University in the College of Business. I enjoy a very good position, and our college has established a very good rating. However, I have been concerned for many years that we evaluate educational institutions and professors incorrectly. Most evaluations I've been involved with have included such measures as number of faculty with terminal degrees, number of papers published by faculty, number of books written by faculty, number of addresses given by faculty and similar itmes that can be counted. Although all of these are noble measures, I believe their importance is exagerrated,and their quality has been overlooked.

In this age of accountability, education needs to also be accountable for its product--the graduate. In many instances, classroom teaching has suffered as result of the absence of a professor who is away too often making addresses. The object of a professor's research project has often been the course work for a semester or two, replacing the previous text and content agreed on for a course because of the current needs of the professor. Students taking this course simply miss the intended content in favor of this research that benefits the professor. One need only read the professional magazines to see that many articles are published that are of little value. Time and effort are taken from classroom preparation to write these. Faculty turn out article after article just to accumulate the numbers. In many cases, the same article is reworked slightly and submitted to another publication.

In none of these instances can faculty be fully faulted. Education has created a system whereby faculty must produce in these efforts in order to receive raises, tenure, and promotion. The institution places these demands on the faculty because these are the measurements which assure accreditation.

My point is simply that classroom instruction has often suffered as result. As a teacher, I have watched as this college and others have lost some excellent classroom instructors who did not publish sufficiently or who did not have terminal degrees. In place of these, many of those hired have looked good on paper but are not effective teachers. Good teachers have been discouraged because of the lack of opportunity for advancement in position or salary without publication or research.

I would not want to diminish the importance of research and publication. However, I also do not believe all persons are equally adept at producing quality material in these areas. As well, those who can and do produce quality research and publications may not be as proficient at instucting and encouraging students in the classroom.

As a parent of children who will one day be in universities, I would like to see the shift of evaluation to that of excellence in the classroom. I see the opportunity provided when students can study under noted professors, however, I don't see the need nor the reality of all professors being notable. I want for my children a teacher who is interested in teaching to the extent that teaching methods and evaluative procedures are refined and hewned into excellence, thus providing maximum understanding.

Your committee has the opportunity to address our evaluative processes. Please take into consideration the quality of the classroom as a measure for accreditation. Another issue of importance would be the quality of publication, appearances, and research rather that the number. If universities will shift the importance now given these areas that tax the professor's efforts to classroom instruction, I believe education would improve.

Thank you for your consideration.

Sincerely,

Judith C. Brown

Senator STAFFORD. With that, ladies and gentlemen, the committee will stand adjourned.

[Whereupon, at 11:30 a.m., the subcommittee was adjourned.]

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